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Secretary Federal Trade Commission
Room-#159
600 Pennsylvania Ave N.W.
Washington, D.C. 20580
16 CFR Part 453

This letter is a response to the recent invitation to comment on proposed changes to the Regulation Rule on Funeral Industry Practices. My comments will address, in order, casket handling fees and application of the rule to all providers of goods and services.

It is my opinion that the rule should be amended to permit reasonable casket handling fees for merchandise sold by third party salesmen and provided by the consumer. This would be much more open, honest and easily understood by the consumer, instead of the creative packages, which we must now create in order to, recoup our fair profit, which has been lost in these cases. Remember fair profit from both goods and services is what feeds our families, supports our communities and buries infants and indigents for no fee. These last two services I might add which are not provided by merchandise sales organizations. In the event that the Commission does not agree that fair and appropriate casket handling fees should be permitted it is only fair that discounted packages be permitted since it is the only way to effectively compete with a third party merchandiser. If a restaurant owner was forced to permit patrons to supply their own entrée, side dishes and desert he would need some creative way to recover a return on his investment or he would quickly go out of business. It is my hope that consumer's protection is the intent of the rule and not the destruction of licensed professional funeral service as an institution.

The Funeral Rule must apply to all entities that provide goods or services since the consumer is vulnerable to unlicensed sales people (usually paid on commission) to a greater extent than they are to a licensed professional who is a member of the community. Secondly, in a competitive environment it is patently unfair to burden one competitor with complex regulations and not apply it to the other competitor. It is simply creating an unlevel playing field.

Frank David DeBor, Esq.
Attorney at Law
Licensed F.D.
Pittsburgh, PA.

412-561-0380
1065 Brookline Boulevard Pittsburgh, PA 15226-2291
Frank David DeBor, Supervisor