



# STRADLING FUNERAL HOMES, INC.



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ORIGINAL

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Secretary, Federal Trade Commission  
Room H-159, 600 Pennsylvania Avenue, NW  
Washington, DC 20580

To Whom It May Concern:

As an owner of an independently owned funeral home, revisions to the Federal Trade Commission's Trade Regulation Rule on Funeral Industry Practices ("The Funeral Rule") will have a direct impact on the way I serve families and market my business. I would like to be on an equal playing field with other factions of the funeral industry so please consider the following points when determining specific revisions to "The Funeral Rule".

I think the definition of "funeral provider" should be expanded to include casket retailers and cemeteries which is essential to providing consumers with consistent information from all providers. Casket retailers in particular, attract customers to their facilities based entirely on competitive pricing, yet they are not required to provide pricing information. Consumers have no reasonable basis on which to compare prices among funeral homes, casket stores and cemeteries.

Over the years, funeral service has become a highly competitive business. A casket handling fee is a normal way of protecting business from competition. Prohibition of a casket handling fee is inconsistent with that of many other professions. For example, many automobile repair shops will not install parts purchased from their competitors. When have you walked into a restaurant with your own steaks and asked them to prepare them for you.? Meeting facilities certainly prohibit conference planners from using audio-visual equipment rented from another meeting facility. And for-profit cemeteries basically charge a handling fee to monument companies who wish to set a stone in their cemetery which they don't charge to their own customers. Consumers have the choice of accepting this handling fee or purchasing a casket at the funeral home where they want to have funeral services. We would just like to be on the same playing field as other providers of funeral related merchandise.

Please consider these thoughts when reviewing "The Funeral Rule".

Sincerely yours,

*G. Tomlinson Stradling, III*  
G. Tomlinson Stradling, III

