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SECRETARY  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Ave. NW  
Washington, DC 20580

Re: Comments Concerning Funeral Rule  
16 CFR Part 453

Dear Sir:

As a private citizen, I am concerned with consumer protection. I will submit comment on certain issues, but my overall concern is the lack of enforcement of the Funeral Rule as it is.

Ref: B. Issues for Comment. 2. Casket Handling Fees Clarification, paragraph 1, P3.  
Why is it the business of the FTC to be concerned about a Provider's recouping mark-up losses because of third party casket purchases? This is *not* money that is owed the Provider. That Provider lost that mark-up because of market forces. The Provider's practice of 300% - 1,000% mark-ups on caskets is exorbitant. The Provider needs to price competitively, *not* shift his mark-up loss to fees.

A Casket Handling Fee would only be a loophole through which the funeral industry could manipulate consumers instead of practicing competitive pricing.

Ref: B Issues for Comment, 3 Non-declinable fee.  
What is the sense of marking up every basic service charged for, then adding a charge for "basic services"? This Non-declinable Fee came about by funeral industry lobbying of Congressmen who applied pressure on the FTC. It is an anti-consumer loophole through which the Funeral Industry has driven a billion dollar truck.

Please stop embarrassing the FTC. Eliminate the Non-declinable Fee.

Ref: B Issues for Comment, 4 General Price List Additions.  
Private viewing without embalming should be added. This was standard until mid-century when the savvy Industry decided this was not profitable.

The price for transportation from death site to a medical school should be included since this is a legal option.

Until the price for the cremation process itself is included on the price list, Providers will continue to hide their *perceived* losses (for not embalming, etc.) in some vague fee as they do now.

P. 2, 16 CFR Part 453 Comment

Ref: C. Request for Comment

1) a) Yes. Now more than ever. Consumers benefit from believing there are standards set forth by their government and some recourse when consumers are exploited at a critical time in their lives.

2) Already commented on under "Issues...") To make the Rule of benefit to purchasers, the FTC should be pro-active in educating consumers as to the contents and intentions of the Rule. The FTC should have a structure of response to consumer complaints which have real meaning – not just token actions against non-compliant Providers as the FTC does now.

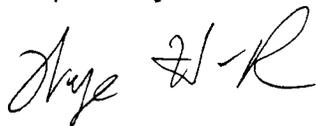
a) Costs as determined by whom? The Industry often defines losses as its being blocked from exploiting funeral consumers as much as it could if not prevented.

3) Refer to "a)" immediately above.

a) The Rule benefits the Providers by requiring them to be a somewhat ethical profession .

In general, I do not see your function as providing equal protection to the Funeral Industry on the one hand and to the funeral consumer on the other as some of your inquiries in this captioned document imply. If you do not exist to protect consumers, then who does? When the FTC caves into lobbying efforts on behalf of the profits of a multi-billion dollar industry, then who can protect funeral consumers?

Respectfully submitted,



Wye Hale-Rowe