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The Millenium Solution for an Eternity

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

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Re: 16 CFR Part 453

To Whom It May Concern:

The purpose of this correspondence is to address the issue of Funeral Rule review. I have learned that the funeral industry is interested in establishing a third party product handling fee. Aren't there enough service fees already?

Competition is not an acceptable or familiar term in the funeral industry. Historically the industry believes it should be exempt from a competitive environment. However, from an economic standpoint isn't it fair to state that competition is healthy and should drive prices lower? I must assume because the funeral industry prices are not declining, there is not real competition in the industry.

The funeral industry is not by any reasonable measure competitive in today's business environment. Their view of competition is to request the enactment of rules and regulations designed to inhibit competition.

It's odd, don't those in the industry understand that continuing to engage in current business practices will generate more competition? They have created a competitive need based on industry greed.

Are you aware that American consumers are electing cremation as an economic alternative to a traditional in ground burial? Today, cremations represent 21% of funerals. By 2010 that figure is expected to rise to 41%. Many consumers want a traditional in ground burial however, the elevated cost is economically prohibitive.

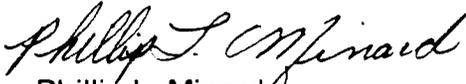
Regarding the Funeral Rule review, Virginia representative Thomas Bliley, Jr, R-7th, stresses his support of competition but states that the playing field should be leveled (Richmond Times Dispatch, 6/21/99). I firmly believe if the playing were level the funeral industry would have no choice but to become competitive. Mr. Bliley infers that " some very non-traditional kinds of businesses" are not worthy of or will provide some perceived unfair competition.

The "traditional" funeral industry is an industry that has run rampant for so long that it perceives "traditional" as the normal way of conducting business. Traditionally competition has been virtually non-existent or very limited. Historically the funeral homes have experienced generous revenues for their services. Greed in the industry has caused external competition to materialize.

The funeral industry cannot be allowed to continue on any further without external competition to drive down funeral costs.

I challenge you not to implement a third party product handling fee. Don't subdue needed competition in the funeral industry.

Sincerely,


Phillip L. Minard
President