



ASSOCIATION OF  
*Independent Funeral Directors of Florida*

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



M. Juhan Mixon, Ed.D.  
Executive Director

To Whom It May Concern:

As president of the Independent Funeral Directors Association of Florida, I represent the thoughts of 200 independently owned and operated funeral homes in our state. The proposed revisions of the "Funeral Rule" will have a direct relationship in how we serve our families in the future. Permit me to offer the following suggestions regarding the proposed changes under consideration.

"Funeral Provider" Definition

Expanding this definition to include cemeteries and non funeral establishment casket and urn retail sales outlets is essential for providing the public with consistent and accurate product information. Casket stores and internet sales attract customers based entirely on competitive pricing, yet they are not required to provide pricing information. If they are selling the same merchandise as the funeral establishment, why not place the same rules and regulations on them?

Non-Declinable Fees

Most families have little or no awareness of the many details which we arrange for and in their behalf. "Unbundling" the service fee will make it necessary for each family to know exactly what they wish or require. While this seems fair on the surface, the fact remains that most families in the state of shock over the loss of a loved one simply will not be able to tell us each detail required. Defining service limitations is not a practical concept in a profession like ours where we must respond to any number of factors within a short period of time. If the FTC should determine that service fees be itemized, we must have, at the very least, the ability to provide a basic list of "non-declinable" services.

The General Price List

We believe this is a valuable source of information to the consumer and clearly should and does demonstrate to the purchaser what has been purchased.

Finally, the funeral profession is facing many changes and challenges, both from within the industry as well as outside. While the "Funeral Rule" should protect the consumer, it should not set up unfair barriers to competition. The public perceives all funeral service

merchandise providers to be in the "death care" industry, whether it be a mortuary, cemetery, or casket store (or internet) provider. We should all operate on a level playing field to insure that the funeral purchaser is not placed in a further state of confusion at a very difficult time in their life, that being the loss of a loved one.

Thank you for the opportunity to respond to the proposed "Funeral Rule" changes.

Kindest regards,

A handwritten signature in black ink, appearing to read "Charles E. Davis", is written over a horizontal line.

Charles E. Davis, President