

Folsom Funeral Service, Inc.

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September 8, 2003

TO: State Board of Registration in Funeral
Directing and Embalming

RE: Proposed Preneed Regulation Changes

Dear Board of Registration,

Thank you for the opportunity to express my opinion regarding the proposed changes in the Preneed Regulations. I am in agreement that this is an area that needs clarification and additional protection for the preneed purchasing public to avoid the problems that, unfortunately, seem to crop up with increasing frequency.

Although I do not profess to appreciate the increase in paperwork, it may be the price that funeral directors will need to pay to keep the confidence of our prepaying families.

However, the elimination of the 10% administrative fee means that funeral directors are expected to provide their knowledge and expertise, frequently on nights and weekends, to prearrange the desired services, set up the selected funding mechanism, and maintain the prepaid account (including the additional paperwork being proposed) for free if a family decides to cancel or transfer their prepaid funeral account/arrangements. I think it is reasonable that I absorb these costs if the cancellation or transfer is the result of my actions (purchase or sale of a funeral home, for example). I think it is patently unfair to ask me to absorb those costs when the reason for the cancellation or transfer was generated by the prearranging family (desire to access funds, desire to change funeral home, etc). It is an admission that our time, efforts, and education have no value.

Finally, as much as I am philosophically opposed to increased government regulation, none of the proposed rules will be effective without a State Board Inspector who can, and will, "spot check" the preneed records of funeral homes to assure compliance. His/her efforts will do more to insure the safety and security of prepaid accounts while also maintaining the privacy of prepaying families than any increase in reporting requirements.

Thank you for the opportunity to respond, and thank you for willingness to address a difficult, but necessary, subject..

Sincerely,

Robert M. Folsom

