

# Funeral & Memorial Society of Chattanooga

Affiliated with the Funeral & Memorial Societies of America, Inc. ORIGINAL  
3224 Navajo Drive, Chattanooga, TN 37411

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June 17, 1999



Mr. Donald Clark, Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue NW, Room H-159  
Washington, D. C. 20580

Dear Mr. Clark:

In response to the FTC Request For Comments regarding the Trade Regulation on Funeral Industry Practices with a deadline of July 12, 1999, the Funeral & Memorial Society of Chattanooga by a resolution of the Board on June 10, 1999, approved and requested the FTC act favorably on the following:

- (a) The Funeral Rule is needed; the interest of the consumer and the public is better served through the EXPANSION of this rule.
- (b) Goods and services should be (1) itemized in detail, (2) standardized throughout the industry in their reporting so that the consumer can compare, (3) available to the public upon request by the standardized form verbally, written, or by telephone, and (4) categorized in such a manner readily understandable by the consumer for all available options. The industry should eliminate all handling fees and the consumer should be vested with the right of declining any service or product within the guidelines of Public Health.
- (c) Insurance companies promoted by the funeral industry for preplanned and prepaid funeral policies should be regulated to the extent that the consumer (a) receives a copy of the policy showing explicitly the terms, a receipt of the premiums and amount, (b) is notified the policy is the paid-up type in writing (if this is true), the premiums paid as itemized covers all cost for the future with no additional assessments, and any income received by the insurance company from the premiums is tax-exempt by the insured.
- (d) Large conglomerates have established a monopoly for all aspects of the funeral industry; therefore, cemeteries, monument and casket dealers should be regulated by the Funeral Rule. Casket dealers or sellers should not be required to be licensed as a Funeral Director. Public interest favors the non-profit cemeteries.
- (e) Rules and regulations vary from state to state; therefore, the FTC needs to establish uniform methods and procedures.
- (f) Explore penalties for violation of the rules and make adjustments in those penalties based on compliance.

Very truly yours,

Sam J. Elkins, Board Member  
By the authority of the Board