Joseph J. Simons, Chair

Federal Trade Commission

600 Pennsylvania Ave NW

Washington, D.C. 20580

April 2, 2020

Dear Mr. Simons:

I strongly urge the Federal Trade Commission to update the Funeral Rule - written in 1984 - that did not require funeral homes to post their prices online. In the digital age, this omission is no longer appropriate. Worse, it continues to force stressed consumers during grief, confusion, and time constraints to shop literally door-to-door to acquire price information from funeral providers. This lack of pricing transparency facilitates price manipulation, represents an undue burden to consumers in the digital age, and is particularly inappropriate during a global pandemic. An updated Funeral Rule that requires online pricing would enable anyone in the general public to get this essential information and get it immediately

Consumers must be able to compare prices for cremation and burial services by visiting the websites of local funeral homes, and viewing clearly-stated prices on a General Price List that contains no hidden fees. Absent this rule, local affiliates of the Funeral Consumer Alliance (FCA) such as People’s Memorial Association dedicate *months* to collecting this information from General Price Lists for cost-comparison surveys for its individual communities and consumer members to make informed decisions. Again, an updated Funeral Rule that requires online pricing would enable *anyone* to get this essential information and get it immediately - not just FCA Alliance members.

Further, an updated Funeral Rule must include cemeteries and require them to also have General Price Lists. Currently, the Funeral Rule neither regulates cemeteries nor requires them to list prices in writing. This deficiency poses unconscionable burden to consumers by making their decisions unnecessarily difficult and enabling unscrupulous operators to manipulate them.

Updating the Funeral Rule to require both funeral homes and cemeteries to post their pricing online will provide much-needed transparency to consumers in their time of greatest need. I urge the FTC to implement these changes. After 36 years, it is time. Thank you.

Sincerely,

People’s Memorial Association Board of Directors