



April 30, 2020

Federal Trade Commission
Office of the Secretary
400 7th Street SW, 5th Floor, Suite 5610 (Annex B)
Washington, DC 20024

Re: Funeral Rule Regulatory Review, 16 CFR Part 453, Project No. P034410

Texas Appleseed welcomes the opportunity to comment on Federal Trade Commission's (FTCs) Funeral Rule. We believe that it is particularly important that the FTC update the rule by requiring funeral homes to post their General Price List online. A posting of the price list online should also be accompanied by a summary of consumer rights under the rule and a link to the FTC website information on the rule, so that people know their rights upfront.

Funerals represent a significant expense for most consumers. They also take place in a difficult time of mourning and often with little opportunity for advance preparation. People should be able to compare funeral home prices easily in order to find services with lower costs and to obtain the best value for services received.

The Funeral Rule provides important consumer protections, including a requirement that funeral homes provide a detailed price list to consumers. However, this protection is limited by the fact that a large majority of funeral homes require customers to visit in-person to obtain the required pricing information. This cumbersome norm is a burden for many consumers who must manage the unexpected death of a relative, especially those from a different location. They often cannot compare prices at even just a few funeral homes, let alone all those in a particular area.

If funeral homes were required to post their price lists on their websites, all consumers managing funerals would benefit greatly. They could compare prices much more easily. Making price surveys available, which allow them to quickly compare prices at all local funeral homes, would be a further benefit to consumers.

Texas has a history of problems with compliance with the Funeral Rule, making the transparency of online disclosures and surveys that much more important. The recent Federal Trade Commission "sweep" [conducted in 2017](#), found that 7 out of 15 funeral homes visited in the Midland/Odessa region did not comply with some part of the required pricing disclosures. In past years, similar deficiencies have been identified in San Antonio (2008) and Corpus Christi and Lubbock (2010).

In this day and age, where so much research and commerce is conducted online, it is surprising that funeral homes appear to resist posting online, despite its nominal cost and the large benefit it provides to potential customers. In a recent search of funeral homes in Austin, Texas, only one of the fifteen homes surveyed posts their price list online.

Requiring online posting and an upfront listing of basic rights would benefit consumers greatly and support fair competition in the funeral services market.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Baddour".

Ann Baddour
Director, Fair Financial Service Project
abaddour@texasappleseed.net