



ASSURANT

March 13, 2014

Writer direct dial 770.763.2504

Email: Barbara.Hollonquest-peterson@assurant.com

Senator Terry Gerratana, Co-Chair
Legislative Office Building, Room 3002
Hartford, CT 06106 Hartford, CT 06106
gerratana@senatedems.ct

Representative Susan Johnson, Co-Chair
Legislative Office Building Room 3004
Hartford, CT 061606
Susan.Johnson@cga.ct.gov

Re: Senate Bill 435

Thank you for the opportunity to comment on Connecticut Senate Bill 435 concerning *The Definition Of Funeral Directing And The Disclosure of Funeral Service Costs*.

Assurant Solutions- Preneed Division is a division of Assurant Solutions. Assurant Solutions is a part of Assurant, Inc. a premier provider of specialized insurance products and related services in North America and selected other markets. The Preneed Division is a major preneed life insurance and annuity underwriter in the United States and Canada and offers coverage in Connecticut through American Memorial Life Insurance Company.

We oppose Connecticut Senate Bill 435.

The revised language in section Sec. 3. Section 20-230b of the bill is problematic and may lead to confusion and misinterpretation. The most obvious interpretation and the one most in keeping with sound business practice is that the revised language applies only to the payment of a commission for the actual sale of a “cash advance” item. The language should not be interpreted to apply to a commission paid by a life insurer to person who is both a licensed funeral director and an insurance producer who completes a “funeral service contract” as defined in section 42-200 which is funded with a life insurance policy.

We understand that the supporters of this bill feel this added provision would apply to commissions paid by life insurers to insurance producers. It would be inappropriate for

this type of restriction to be placed in the purview of the Embalmers and Funeral Directors section of the general statutes.

Finally, as mentioned in the bill text, the Federal Trade Commission already requires that a statement be included on the statement of funeral goods and services relative to any cash advance items that a funeral provider receives a commission on the sale of that good or service. 16 CFR 453.3 (f)(2) provides, "...We charge you for our services in obtaining: (specify cash advance items)...."

It is for these reasons this bill should not move forward as currently drafted. Thank you again for the opportunity to comment. My contact information is on the letterhead

Sincerely,

Barbara H. Peterson
Regional Director Government Relations
Assurant, Inc.
260 Interstate North Circle SE
Atlanta, GA 30339