

Competition and Markets Authority  
Funerals Market Study

26<sup>th</sup> February 2020

Dear Sirs

I write on behalf of Freeman Brothers Funeral Directors, in response to your working papers and the remedies therein.

Firstly, I would like to tell you a little about our business.

-Freeman Brothers started trading in 1855 in premises which we still occupy in Horsham, West Sussex.

-We have three further satellite branches in Crawley, Billingshurst and Hurstpierpoint in West Sussex, the latter of these having opened this time last year after we acquired and fully refurbished the premises.

-We are descended from the activities of a general builder and carpenter, who carried out funerals as one of his many activities. The current proprietor is a direct descendent, and his son, the sixth generation of his family to work in the funeral industry, also works within the business.

-I manage the company day-to-day, having been recruited to my role around thirteen years ago.

-We carry out in the region of [redacted] funerals per annum. We operate our own pre-paid funeral plan held in Trust; [redacted]; we have collected Deceased people on behalf of the Coroner's service since before there was even a tender process for such an activity.

We have a few general observations from the various documents issued on 30<sup>th</sup> January 2020 which I will outline prior to answering some of the questions contained in the remedy documents.

General Observations on document: 'Funerals market investigation, Overview of key research and analysis'

-We would like to query the use of value-laden language such as 'short cuts' in point 6 and 'lack of engagement' in point 17, especially in light of the fact that point 30, which states that the 'large majority of customers... felt they had received the right amount of information at the right time' contradicts this impression.

-In point 18a, you mention your roundtable with 'progressive' funeral directors. We find terms like this to be unhelpful. The implication that a supposed 'traditional' funeral director is by default not 'progressive' in outlook is reductive and probably incorrect. Most 'traditional' funeral directors will offer a very broad range of options so may well, in fact, offer more choice than a so-called 'progressive' who will only facilitate certain types of service.

-The suggestion that 'progressive' funeral directors are in some way acting to the benefit of their clientele in any comparatively heightened way is impossible to prove and so cannot be relied upon.

-That a firm considers itself 'progressive' does not necessarily correlate with cost savings for its customers. [redacted]

We also offer a simple funeral, advertised in the same place on our website and other pricing literature as our standard package, where the costs would be a further £[redacted] cheaper, while this supposedly progressive firm does not mention such an offering.

-In respect of point 36c- a lack of evidence that higher prices are 'necessary' in the provision of 'good quality back of house facilities' does not mean that there is no logical link between the two. Good

quality facilities do cost money- in 2016 we installed new cold storage which more than doubled our business' capacity. This was at a cost of roughly £[£], which is a significant investment for a business of our size. We considered our old facilities were good quality but this can only be considered an improvement.

-in point 75 that you note the potential for remedies to have a 'significant cumulative burden on smaller funeral directors in particular'. We would suggest that it is the larger players in the market whose actions have been more transgressive. Smaller players obviously have less ability to carry out any actions whose impact can be felt across the market and we feel it incumbent upon us to point out that these larger players are also best able to cope with any onerous remedy which is, as stated above, a consequence of a market shaped by them as opposed to smaller players who would be harder hit. Therefore, smaller businesses are at a risk of suffering a double detriment if a new regime is introduced with which compliance is difficult, when this is a remedy for a situation not of their own making. When Steve Murrells (Co-Op Group Chief Executive) told the BBC's Wake Up to Money that the behaviour of the funeral industry was 'wrong' and firms had 'kept putting prices up', he certainly was not talking about the practice in our business and we suggest that it is presumptuous of him to ascribe what we can only assume were the Co-Operative's practices to the industry as a whole when he has no knowledge of how other- especially smaller- businesses in the sector operate. We do not believe small businesses should need to struggle to comply with an onerous regime- and, in a worst-case scenario, leave the market and remove customer choice- because those with a large market share have operated irresponsibly.<sup>1</sup>

#### General Observations on document: 'Funerals market investigation, Funeral director sales practices and transparency'

-At point 4, it is stated that 'most consumers do not research funeral directors before point-of-need', however this is contradicted in the same paragraph by the assertion that most will make a choice based on 'recommendation or previous experience'. Eliciting recommendations is a form of research. It could also be considered that previous good experience (as the vast majority of customers will have had, as the CMA's own research consistently shows) represents research- albeit not of the in-depth kind that might be preferred if price and business ownership are investigated.

-In light of points 62-64, it may be of interest to note that we recently commissioned a mystery shopping activity in which all of our telephony staff were contacted and all of these showed a willingness both to discuss costs in a way appropriate to the query and to direct the caller to our website where all of this information is available for consideration and download. Therefore our clients' experience is likely to be akin to that noted in point 78.

-Point 133 notes that independent funeral directors are unlikely to require upfront payments or deposits. This shows they have good relationships with their customers, further reinforcing the point that previous experience is to client benefit. However, we would suggest that there are not many types of business which would give a customer £4000-worth of interest-free credit without the benefit of a credit check, which we believe many of these businesses will be doing. It could equally be argued that this shows a lack of commercial focus, and therefore somewhat flies in the face of the portrayal of funeral directors as cynical businesspeople who are exploiting their clients by not offering as low a price as they could. We do ask for deposits to cover the cost of third-party disbursements. This is explained to customers at the earliest possible opportunity and it is rare for our client base to have issues with this policy. In those cases where a client is not able to afford the deposit then we have a conversation about requirements and costs; in fact, asking for a deposit is an effective way to turn the conversation to finances. If a customer cannot afford the deposit we do enquire as to their ability to pay the rest of their bill in due course. We will then try to find more affordable solutions. We think many other smaller funeral businesses operate in the same way and

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<sup>1</sup> <https://www.bbc.co.uk/news/business-46430520>

again, ask how this compares to other sectors. We would not proceed in this way if we were solely motivated by excess profit at whatever consequence. There is no benefit to us if a client spends £5000.00 on a funeral for which they are unable to pay.

Answers to questions raised in point 14 of 'Funerals market investigation, Funeral director sales practices and transparency' document

14a- We do not restrict customers' ability to purchase coffins from third parties. It should be noted that some coffins will not meet standards for cremation and we would make customers aware of this should they want to obtain their own coffin for a cremation funeral. We think this should be standard practice.

14b- Prior to the arrangement meeting we would ask the client about their requirements for an officiant.

-In the event that there is a specific requirement we would make contact with this officiant in advance to obtain their availability and ensure the booked date and time was suitable.

-If there was no specific requirement, the funeral arranger would make enquiries in the arrangement meeting and this would inform the process of selection.

-For example, if the client required a Church of England Minister then we are locally required to contact the minister of the Parish where the deceased person resided and there is then no ability for the funeral arranger to exercise any influence.

-In cases where there is a lack of clarity on what is required, the funeral arranger will establish the type of service wanted which will lead to a conclusion about the type of officiant, whether religious, civil celebrant, Humanist, etc.

-The funeral arranger will then use a variety of techniques throughout the arrangement meeting to determine the most suitable officiant from those we use regularly and have positive experience of. This might be by asking about the tone of the service, through conversations about potential music or the deceased person's belief and preferences- even the body language of a client can give clues as to the likely suitability of one officiant over another. Our funeral arrangers have a high level of awareness of the types of service a particular officiant might offer and we will also set store by other factors such as their reliability, how quickly we know they may contact a family, etc.

14c- We do not offer legal services. We think any legal service in which the funeral director firm has any interest should be declared at point of recommendation. We are unsure how likely it is that the potential cost of a funeral could be affected by the knowledge of the size of the estate, as we would imagine that such a recommendation would only be sought at the stage of making the funeral arrangements, by which time most of the costs should already be known and an estimate provided.

Comments on regulation remedies

Please note that we have below only replied to those questions where we have an opinion and/or believe our experience enables us to comment with relevant information. We have not responded to every question. We will be submitting an additional response regarding your second set of working papers in due course.

**Quality regulation remedies**

*108 Do you agree with our proposal to focus quality regulation on the services provided by funeral directors or do you think we should also regulate the quality of services provided by crematoria operators? Please explain your answer.*

We feel that any quality regulation should not only focus on funeral directors but also on third parties including (but not limited to) crematoria. The quality, or otherwise, of the services provided at the funeral venue have a significant effect on the customer's overall experience and there are procedures inherent to the cremation process- such as the identification of cremated remains-

which are entirely out of the funeral director's control and yet are fundamental to the successful delivery of a funeral.

It should be borne in mind that the crematorium is always paid for their service, whether by the DWP in the case of a client who qualifies for that assistance; the Local Authority for an Environmental Health funeral; or the funeral director who then typically asks to be reimbursed by the family. This can lead to a lack of consequence in the event of a poor service. As a business, we have experienced situations where our client has felt the crematorium's service has been deficient and is not willing to pay the full cost. In some of these cases, the crematorium has been willing to offer a partial reduction but in others this has not been the case. We have then been in a position where our customer will not pay our full bill as they wish to withhold the difference between what they are willing to pay the crematorium and what the crematorium is charging. This places us at a financial disadvantage and ultimately will have an effect on our margins as it is in our own costs where the loss is felt. If funeral directors are to be judged on quality, this is an ideal opportunity to increase standards across the board and increase client satisfaction. Where an organisation is guaranteed to be paid, the least we should expect is a set of compulsory and objective standards to which they are held accountable and which means they have to take responsibility when things go wrong. We feel that a scheme such as the FBCA's Crematorium Compliance scheme uses objective criteria and is ideal for this purpose.

*109 Do you agree with our proposal to focus quality regulation on back of house standards? Please explain your answer.* We feel back of house standards should be judged as a part of any quality regulation, but that these are not the only measures of quality. One example might be, the facilities and staffing that a business is able to offer. A reliance upon its own fleet and staff rather than hired bearers and carriage masters makes it easier to guarantee a service which has been committed to-an important aspect of quality.

*113 Which of the services provided by funeral directors should be included under the scope of any quality regulatory regime, including statutory minimum standards, and why? We are particularly interested in your views on the regulatory standards set out in Table 1 and the following specific issues:*

*(a) Is refrigeration necessary for the appropriate care of the deceased? Yes, we believe so.*

*(b) Is the ratio of one refrigeration space for every 50 deceased persons taken into the care of the funeral director on average per year (as proposed in the draft Code of Practice for Funeral Directors in Scotland) an appropriate ratio? If not, what is? We have more than one space in 50 which we feel is needed to accommodate seasonal fluctuation and the increasing length of time between the death and the funeral (locally to us, this now averages 21 days). A one in 50 ratio would require us to have [X] spaces, which we would find insufficient.*

*(c) Is it appropriate to require that each deceased must be stored individually in separate compartments within the unit (as proposed in the draft Code of Practice for Funeral Directors in Scotland)? Yes, we think so.*

*(d) Should training and/or education be mandatory? Please explain your answer. In the event that training and/or education was made mandatory, please comment on:*

*(i) Which members of staff require formal education and to what level (ie A Levels (or equivalent) or a degree or professional qualification) and to what extent can formal education be substituted by experience or other forms of training? Anyone embalming should be qualified to BIE or equivalent body standards. Monumental masons should receive vocational training to enable them to be placed*

on the Register of Qualified Memorial Fixers. For all other job roles it will be entirely dependent on that role, the size and type of business, their previous experience and so on.

*ii) Is it necessary to create a nationally accredited professional education programme or allow funeral directors to choose from the currently available qualifications? We would suggest a non-compulsory, multi-level framework of qualifications on a nationally accredited basis (comparable to NVQs for care?) might be the best way to proceed.*

*(iii) Should there be a number of specified hours of training, and any other form of CPD, that staff should be required to complete each year, or should staff or their employers self-assess their professional development needs? Businesses should self-assess as this will vary significantly according to the job role, capabilities of the individual, and extent to which job roles are segregated within the business, as well as other factors.*

*(iv) Are there any other requirements that should be imposed on staff, owners and controllers of funeral directors to ensure their technical and professional competence (eg age, conduct or experience restrictions)? We do not believe so.*

*(e) Is there a need to establish an independent ADR scheme and/or complaints adjudicator in addition to the funeral directors' own complaint handling and customer redress? We believe it should be compulsory for all funeral directors to be members of a body which offers such redress.*

*114 (b) What role, if any, should the existing trade associations (ie NAFD and SAIF) and other relevant organisations, such as the Good Funeral Guide, play in relation to the quality regulatory regime? Please explain your answer.* We are members of the NAFD and SAIF and feel their inspection regimes- if operated as designed- ensure we have good standards, however this is of limited use when there is no obligation upon businesses to join one such scheme. The Good Funeral Guide is ideological and only interested in certain types of funeral directors and so while organisations such as them have a place in providing a forum for the interests of that type of business, they should not be viewed as objective and therefore to have authority. An organisation which takes a standpoint that any particular type of business is never going to be 'good' simply by virtue of being of a 'bad' type is divisive and unhelpful when all businesses should be encouraged towards best practice.

*115 Should a licensing and inspection regime (see paragraphs 52 to 73) apply to individuals or businesses or both, and why? If both, what should be the respective obligations of individuals and businesses?* We feel that the models which are best suited to the funeral industry are either those from the pharmaceutical industry or the 'licensed' (sale of alcohol) trade. In both these instances there are license requirements for both the premises (obviously these vary according to the two industries concerned) and the responsible person, whose duties include to enforce the premises requirements. For example, we can imagine a situation where funeral homes were classified by the activities which took place there (perhaps arrangement office/arrangement and Chapel of Rest/arrangement, viewing and storage but not embalming/full mortuary including embalming) with different licensing requirements, and then the premises classification determining the extent to which the responsible person needed to be licensed.

*116 (a) What would be the likely costs of quality regulation to funeral directors? This includes the costs of implementing any changes necessary to comply with the regulation and the costs of demonstrating ongoing compliance with the regime.* Businesses without refrigeration would face considerable costs including the possibility of relocation or significant building work to accommodate this, if it should become a requirement. There would also be ongoing costs in terms of equipment maintenance.

*(b) What would be the likely costs of implementing and running the regime and how should this be funded? We are unsure of the costs of implementation but it seems inevitable to us that funeral directors will be expected to fund such a scheme and therefore this will be paid for by their customers.*

*119 What information on the quality of services provided by funeral directors should be collected and disseminated to customers to enable them to assess and compare funeral directors? This is hard to answer because of the diverse nature of funerals and the potential wide range of factors which may be of importance to any specific customer. Often, part of the judgement of the quality of service may come down to the personality and 'quality' of the staff- which is not something which is easy to assess or can be guaranteed even through a mandatory training regime. However, we might suggest the following might be important:*

- type of refrigerated storage
- quantity of refrigerated spaces
- location(s) where deceased person may be kept
- information about ownership of funeral fleet (e.g. if owned/maintained by company or acquired from a carriagemaster)
- Information about staffing for the funeral- are these the company's employees or 'freelance' hired bearers
- Ownership of the business
- Disclosures on recommendations of third parties such as celebrants
- Information on ownership of recommended third party services (unusual vehicles etc.)

It might be sensible, should this route be pursued, to carry out qualitative research to establish which issues the public tend to think are most important and use this as a basis for any statutory system.

## **Information and transparency remedies**

### **Remedy 1 – Price transparency and comparability**

*57(a) How can we best facilitate shopping around and increase customer awareness of total funeral costs and local price differentials?*

Ideas might include:

- compulsory online pricing
- monitoring by a regulatory body to ensure quotes given by phone are accurate
- ensuring quotes mention disbursements
- ensure advertised prices which do not include disbursements make clear the fact that this is not a 'total price'
- a compulsion to clarify what affects a price if it is advertised as being 'from' a certain figure
- advertising campaigns to engage the public
- carry out research try to establish most important decision-making criteria for customers and oblige funeral directors to publish information on those- this may include, for example, where the deceased person is kept before their funeral

*(c) How can we better prepare the customer for the arrangement meeting and make them aware of all the options offered by the funeral director, including low-cost options? One way might be to oblige funeral directors to advise customers of their website and prices thereon before meeting, although this will at present not be helpful to all clients as internet use is not universal.*

*(d) How can we give customers a clearer idea of the final cost (early on in the process of choosing a funeral director and before the arrangement meeting)? We are unsure how it can be done more*

effectively than by our own practice which is to ensure staff understand costs and give them freely when asked, and by publishing them in full on our website. Therefore, we suggest all firms should be encouraged to view this as best practice.

*(e) How can we make the platform most useful for customers how can we ensure that it is used by as many customers as possible?* By thorough advance research of customer need and the customer journey through similar websites.

*(f) Should funeral directors and crematoria operators be required to adopt a standardised methodology for presenting pricing and service data as an alternative to the platform?* This may not always work, depending on your definition of a funeral director and the basis for comparison. For example, the information could be deceptive:

-A national direct cremation company which stores deceased people in a central holding facility and cremates in one location through a contract is ostensibly offering the same service as a local funeral director who carries out a direct cremation at the local crematorium. However, the differing nature of their businesses means their costs may be very different and so a presentation of only the costs makes a comparison more, rather than less, difficult.

*(h) What will be the likely costs of this remedy?*

The costs to a business which doesn't have a website creating one should be quite minimal. However, the costs of the 'platform' are likely to be significant and it seems inevitable to us that this would be passed onto funeral directors and therefore, by extension, the bereaved would pay as this would be a cost to the funeral business.

*(i) Will this remedy give rise to any potential unintended consequences?*

There is a risk that some bereaved people might have costs discussed with them at an earlier time than they consider appropriate and this may lead them to view their initial firm of choice, with whom they have such a conversation, in a less positive light. There is always a risk that some businesses will not adhere to such requirements which will place businesses which do adhere at a potential disadvantage.

### **Remedy 3 – Funeral planning awareness before the point of need**

*77 (a) Are there particular circumstances prior to the point of need at which consumers are likely to be receptive to the idea of preparing for their funeral or that of a loved one?*

Our instinctive answer to this is that times might include:

-Entering care;

-A the time of a terminal diagnosis (whether by GP or hospital);

-Entrance into hospice

but all of these might be 'too late' and might be found by some to be inappropriate or in bad taste.

-We expend considerable time and effort in publicising the need for the public to discuss their funeral wishes and a key aspect of this advice is that it is better to discuss through choice rather than through compulsion.

-The increase over time in the advertising of pre-paid funerals might be useful in this respect, as seeing such adverts may prompt conversations about funeral wishes more generally.

### **Remedy 4 – Mandatory 'reflection period'**

We have chosen to answer this question as a whole and would make the following points:

-Some groups have religious requirements which necessitate funerals happening quickly and so they would be disadvantaged by any reflection period.

- Some clients who have a very clear understanding of the funeral they would like may be unhappy at being told they cannot finalise everything at the date and time of a first meeting.
- Some people in insecure employment or with employers who are not understanding may struggle with a need to make two visits to a funeral director.
- As with other possible remedies mentioned, those funeral directors who respect the reflection period will be at a disadvantage to those who do not. We see this as analogous to the Distance Selling Regulations. We comply with these and as a result we carry out very few funeral arrangements at home. We are aware of many funeral directors who do not comply with these, including previous employers of our current staff.
- There will be inevitable staffing costs to every business if every customer has to be seen twice and these will be passed on to the customer.
- We consider that there is a significant possibility that such a reflection period could increase the wait between the death and the funeral.
- We are unsure when would be appropriate to make the funeral booking in light of such a reflection period.
- There will be consequences to small businesses if customers are allowed to cancel without consequence at too late a stage in the process, especially for those very small businesses who can only carry out one funeral on any given day or half-day. They may reject custom on the basis of a booking which is subsequently cancelled and face significant detriment.
- We can only see how this remedy is possible if there is a waiver system for customers who do not wish to be able to take advantage of the reflection period. However, businesses which explain this well as opposed to those who do not would again be at possible detriment as outlined above.

**Remedy 5 – Potential cap on the level of charges incurred for the collection, transportation and storage of the deceased**

*97(a) Will the imposition of a cap on the collection, transportation and storage of the deceased encourage more customers to switch funeral directors after having reflected on their original choice of funeral director? We don't believe so.*

*(b) How should the cap be calculated? We believe it should be calculated by reference to three separate parts:*

- Time of collection (for local collections).
- Distance of collection (for collections outside determined 'local' radius).
- Storage on a per day rate.

*(i) Should the charge for collection and transport reflect the distance covered by the funeral director or represent an average cost? It should reflect distance- and also time of day, as for small businesses who cannot employ night teams of staff, there are significant staff overtime costs in operating an out-of-hours service.*

*(ii) Should there a daily charge for the storage of the deceased or an average charge for storage, which reflects the average length of time that the deceased is typically stored? Daily, otherwise there would be a disincentive on the second/new provider (who the family had subsequently decided to use) to take the deceased into care as soon as possible, which should be encouraged. The deceased person should be in the care of someone who is not the family's chosen provider for as short a time as possible after a decision to change providers has been made. Storage should specifically exclude preparation or viewing as this should not be carried out by a firm who is not of the customer's choice.*



*(c) Are there other approaches to setting a potential cap on charges levied by funeral directors for the collection, transportation and storage of the deceased (other than cost-based approaches) that the CMA should consider? We cannot think of any.*

*(e) Could this remedy give rise to any unintended consequences?* Funeral directors are very used to collecting deceased people on behalf of other funeral directing firms, particularly in the case of that person having relocated out of the area where the funeral will be. Such relocation can often involve a distance which might be considered within a radius feasible for moving for care reasons- but too far for a doctor to travel to see the deceased person for completion of part one cremation papers. (Frequent examples locally to us would be: Worthing/Horsham (20 miles); Midhurst/Billingshurst (15 miles).)

-Currently, many funeral directors may not charge for storage in these circumstances but might start to do so if there was an official mechanism in place.

-Some unscrupulous funeral directors might make the 'capped' charge their default price regardless of their previous mechanisms and therefore this could lead to costs increasing compared to how they might presently be calculated.

-In the case of long-distance removals, for example from Tyneside to London, the costs permitted to charge might be the same due to the cap but a funeral director in Tyneside would incur lower costs to take the deceased person to London due to lower fuel prices, staff wages etc. than the London funeral director would incur carrying out the reverse journey. Therefore, there is a potential for firms in areas where the cost of living is lower to make more profit from a capped cost. They may previously also have charged less for such a collection (on the basis of outgoings) meaning their customer may also pay more under the new, capped system.

-There may be an increase in the quantity of third-party repatriation firms if businesses find the capped costs not conducive to their operational necessities. These firms have no onward responsibility for the deceased person and so may be less concerned about their condition in transit. The same firms will also presumably not be 'funeral directors' and so not subject to the cap and so this could lead to a 'race to the bottom' in standards as firms seek to subcontract.

## **Remedy 6 – Managing conflicts of interest**

*104(a) Are there any other ways to eliminate conflicts of interest that may adversely impact the quality of service provided by funeral director to customers?*

-We do not have any partnership agreements with any provider which means they facilitate an introduction in return for financial inducement.

-We would suggest that the third party (hospice/care home) should be forced to declare the arrangement at time of recommendation.

-Many third parties will recommend a particular funeral director based on previous positive experiences (for example, seeing their staff exhibit good practice upon collecting a deceased, attending funerals for previous residents which are carried out well) and a declaration that a recommendation was on this basis would have the benefit of reassuring prospective clients that no money was changing hands.

*(b) Are there any other types of inducements or payments that should be captured by this remedy?*

Some hospitals without storage facilities would be considered comparable to care homes or hospices so should be included in any remedies.

We would also like to comment on point 99b regarding upselling by funeral staff. Staff should be trained to discuss customer requirements and ensure the client is aware of all possible options in order to assess which are most suitable for their needs. Assumptions should not be made about a client's requirements without such conversations. Care should be taken to ensure that such

conversations, which may be a way to monitor good staff performance, are not disincentivised through over-discouragement of upselling.

### **Remedy 7 – Disclosure of business ownership and other commercial relationships**

*112(a) What potential harm could the non-disclosure of business interests and other commercial relationship cause customers?*

-We believe customers have a right to understand who operates a business as- apart from many other reasons- this ensures they do not carry out false comparisons between differently-named businesses with the same owner and then come to incorrect conclusions over pricing.

-We wonder whether businesses should be allowed to acquire firms and trade solely under the old name, or whether the new ownership should be obliged to give their trading name heightened prominence. This will prevent customers assuming they are using the same firm as a previous funeral in the event that it has changed hands subsequently.

*(b) What business relationships and other commercial relationships should be disclosed to customers? If a funeral director recommends a service or service provider in which they have a commercial interest, this should be disclosed. For example, some funeral directors are also trained as civil celebrants but customers should not be compelled to use this service instead of a third party celebrant, especially if the charge for offering that service is comparable.*

*(c) How should such interests and relationship be disclosed to customers? At the point that the service is being recommended.*

*(d) What are the likely costs of this remedy? We suspect larger firms who may rely on the goodwill which comes with acquisitions would lose some of this custom if they were compelled to declare their new ownership more prominently.*

*(e) Will this remedy give rise to any potential unintended consequences? We don't believe so.*

If there are any questions arising from our comments and answers, or if we may be of assistance in any other way, please don't hesitate to contact us. The details are in the signature of my email account from which this was sent. We will, in due course, submit a reply to the set of working papers issued on 20<sup>th</sup> February.

Yours faithfully

Freeman Brothers Funeral Directors