



Office of the Secretary

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

August 11, 2014

Franklin Jack Burr II
New Jersey

RE: In the Matter of Service Corporation International and Stewart Enterprises, Inc.,
Docket No. G4423

Dear Mr. Burr:

Thank you for the comment

Stewart in the first place. The Commission determined, however, that the acquisition violated antitrust law in only a limited number of the overall markets in which SCI and Stewart operated. Under such circumstances and given the nature of the businesses involved, the Commission also determined that divestiture of assets in the relevant markets would adequately remedy the violation, rather than acting to block the entire transaction.

Second, you claim that the Order does not protect the Jewish community in connection with SCI's acquisition of Stewart assets in the DC Metro/Maryland market. The Commission considered this issue including the comments received when the Commission released its consent agreement on the public record, and determined to issue the Order without modification. Both the Jewish Funeral Practices Committee of Greater Washington and the Jewish Community Relations Council of Greater Washington, who commented on the consent agreement, support the remedy.

Third, some of the specific objections mentioned in your comment appear to stem from an unfortunate family dispute over the disposition of your father's remains. Such a dispute cannot be resolved by the Commission, and must be resolved by the family members or other interested parties. You also express concern that the sale to NorthStar would involve an illegal sale of a body and that NorthStar might be left with potential liability to your family. The buying and selling of funeral homes does not, however, constitute the illegal sale of bodies, and the question of any liability, and indemnification, is a matter for resolution by the buyer and seller.

Finally, your comment also claims that SCI charges high prices and may have engaged in price-fixing. In addition, you assert that SCI has violated the Commission's Funeral Rule by illegally acquiring another company, operating a business without a properly registered fictitious business name, and colluding with others.