

Name Lawrie Williams  
Business name NSA JuicePLUS  
Date 6-01-06

Dear Sir or Madam:

I am writing this letter because I am opposed to the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a NSA JuicePLUS DISTRIBUTOR. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell JuicePLUS+ products.

I have been an NSA JuicePLUS+ DISTRIBUTOR for more than 6 years. Originally, I became a DISTRIBUTOR in my company because I felt the products were exceptional and I wanted to earn some additional income. Since that time as life happens, my husband had an accident and was unable to return to his 33 year career as an engineer. If it weren't for my NSA/JuicePLUS income we might not have made it on my teacher's salary alone. Now, I am retired, (6 years early, by the way, BECAUSE of my direct selling business), my husband is on disability and SS and my family is supported through my direct selling, NSA/JuicePLUS business. The future of my family is dependent on the stability of the direct selling industry.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new DISTRIBUTORS. National Safety Associates sales kits only cost \$50.00. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the marketing plan. I also think this seven-day waiting period is unnecessary, because NSA already has a 100% buyback promise for all products purchased by a distributor within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about becoming a distributor and will then need to send in many reports to my company headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless NSA is found guilty. Otherwise, NSA and I are put at an unfair advantage even though NSA has done **nothing** wrong. Actually in their 35 year history they have flawless business record and have the utmost reputation in the industry. In fact their marketing plan has been taught in universities.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am extremely uncomfortable giving out the personal information of individuals (without their approval) to strangers. In fact I am vehemently opposed to it as I would be if someone gave out my information. Also, giving away this information could damage the business relationship of the references who may be involved in other companies

or businesses including those of competitors. I also STRONGLY feel the following sentence required by the proposed rule will prevent many people from wanting to sign up as a distributor - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met and this could prevent them from joining our team. Joining NSA and JuicePLUS has been one of the most positive moves in my entire career. I was a teacher for 30 years and I never could make the money that NSA affords me. My income is directly proportional to my efforts and the number of people that I help improve *their* lives. This freedom and control over my future is something that traditional jobs cannot offer. This direct selling industry has been a godsend and changed my life and my family's life, all for the better and I fear your proposed new rule will greatly jeopardize my future success and **I AM STRONGLY OPPOSED TO IT.**

In Conclusion, I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

Lawrie Williams