

June 5, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

<https://secure.commentworks.com/ftc-bizopNPR/1>

Dear Sir or Madam:

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

One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new consultants. Accentz Jewelry already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Many times my recruits have excitement built after a profitable show and are anxious to join our company. A waiting period stands to have these recruits lose the enthusiasm and possible shows that get their business off and running. Many potential recruits are familiar with direct sales and look at several different companies before making a decision, adding on another 7 days gives the impression that we are doing something illegal.

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 Accentz Jewelry is found guilty. Otherwise, Accentz and I are put at an unfair advantage even though we have done **nothing** wrong.

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 very uncomfortable giving out the personal information of individuals (without their approval) to strangers. 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. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to our headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson "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.

I have been in the direct selling industry for the past 10 years and have enjoyed the benefits and flexibility that this business has had to offer. I realize there have been several fraudulent companies that surface each year, but compared to the legitimate direct sales companies these are few and far between. We as direct sellers should not be forced to disclose personal client information and lose potential business, when we are operating with integrity. When starting a business opportunity each individual needs to investigate and screen companies before choosing what the right fit is for them. The DSA and DSWA are committed to highlighting our companies that are legitimate and concerned with helping its members make a good living.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,