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June 8, 2006

**RE: Business Opportunity Rule, Matter No. R511993**

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 a Young Living 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 Young Living products.

I recently became a Young Living Distributor after much research, and personal use of the products. My livelihood is not dependent on the business but the products are an ideal support for my clients. I chose Young Living because the quality of the products is the highest available and I want the purest therapeutic grade oils to support my clients. The additional income that is available to me through sharing the products is important to me. I'm self-employed and have been a single mom for 11 years now. I struggled to establish my business and support my children. I sought products that enhance the work with clients in order to maintain credibility and high quality return for them.

The future of my business, and my family, is dependent on the stability of the direct selling industry. Young Living is just one avenue that I'm involved with. There are other direct selling ventures that add to my product bank, and add value for my clients. My business, and income, will be severely curtailed by the proposed rule.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new distributors. One of Young Living's sales kit only costs \$50.00 while the fuller kits cost only \$150.00. Distributors are able to choose whether they wish to receive a monthly shipment of product or not. In fact, one can spend \$50.00 per month, a small amount of money, to have the ability to develop a lucrative business. This is not a business that requires extreme amounts of money to gain from. We can cancel our membership easily at any time. We can stop the monthly auto-shipment with a click of the mouse any time.

The waiting period gives the impression that there might be something wrong with the company or the compensation plan. Young Living has a solid reputation, extraordinarily high quality product, and has created a way for anyone to experience benefits, whether one is an occasional purchaser, a preferred customer, or a distributor. There are three levels of involvement and one can easily choose how much to spend and how involved to get.

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 Young Living is found guilty. Otherwise, Young Living and I are put at an unfair advantage even though Young Living has 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 Young Living's 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. This is not required at a car dealership where we spend many thousands of dollars to obtain a vehicle. It's a serious block to success for people like me.

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,  
Kimberley Simon