

Re: Business Opportunity Rule, R511993

I have just been given information regarding this proposed rule and am very alarmed at the way it would affect me, personally, as well as all other direct sellers. While I do believe that the intention behind the rule is to protect consumers, which is important, I find that the details of the rule go much further beyond protection and will actually make it harder for informed consumers to do what they really want to do.

I started working as an independent demonstrator with Gold Canyon about 8 years ago and have built a very successful business for myself. My decision was made quickly but informatively (in much less than 7 days) and it comes across as insulting that a government entity would not allow me to make a decision as quickly as I want to. That 7 days of waiting time to sign with a company would have taken away the excitement that I had to get my business up and running which could have had a huge impact on the success that I've had with my business. The companies with the DSA already have in place ways for new demonstrators to "get out of" their contracts if they realize they've gotten in over their heads by offering a partial refund if they want to quit within one year of the purchase. This allows people to make their own decisions, in their own desired time frame, while still offering a way out if they realize they've made a mistake.

I also am concerned about having to show to new recruits all the people who have recently gotten out of the business or brought law suits against my company. There are too many times when someone will get mad because things didn't go their way or will just sue for petty reasons and by showing all the law suits without giving the whole story would just scare away potential new recruits. A listing of all people who have left the business in the last year would also be very tedious to keep track of as well as again not giving a true feeling for the company since there may be many who leave the business for reasons that are not relevant at all.

My last concern is having to provide a list of other people in the business who live in the area. Again, this would be a tedious record to keep & update for each potential recruit based on where that person lives. It would also infringe on the privacy of those whose contact information is being shared. You also run into the potential of someone coming to you, feigning interest in your business, so they can get the names of others in your business to either try to recruit them away to a different business or use their information in ways that are not appropriate.

Please reconsider this rule and realize the implications it will have on the many individuals in this country who work as direct sellers. For someone like me, it will make my job so much harder, more tedious & involving mountains of more paperwork and for someone who wants to join my team, it will create an undesirable wait time as well as creating doubt in the integrity of my company. Please look to organizations like the DSA and the DSWA who can help you to understand the implications of this rule on direct sellers and maybe help you to find ways to protect the consumer without such a negative impact on the direct seller.

Thank you ,
Kim Milius