

Tracie Penunuri
AtHome America

Re: "**Business Opportunity Rule, Matter No. R511993**"

June 13, 2006

Dear Sir or Madam:

I have been a direct sales consultant for over seven years, and the influence of my business has had a tremendous impact on my family. I am the mother of three small children, and as a result of the success I've experienced selling home décor products and marketing the business opportunity, I have been able to stay home with my children when they have needed me most, while still contributing to our family income. My involvement in AtHome America has also given my husband quality "daddy" time when he has been able to connect with our children while I have worked. Being home with my children is especially important in our home because my oldest child was born nearly four months prematurely, and as a result, she has multiple medical issues as well as global developmental delays. Instead of causing a burden for our government by requiring that her care be paid for with tax dollars, I am able to stay home and care for her myself. I chose to be a mother because I wanted to parent my children, and my home-based business allows me to do just that.

The proposed Business Opportunity Rule R511993, as it is currently written, will jeopardize my ability to continue to be home with my children. We live in a predominantly two-income society, and our family depends on the income that I contribute. It is not acquired through deceitful or dishonest practices—our company contract and training policies are quite clear from the very beginning. I appreciate the opportunity to share that information openly with every person interested in starting an AtHome America business.

There are several components of the current rule that are concerning to me: first, the seven day waiting period. One of the great benefits of becoming involved in direct sales is that a business can be started quickly and profits can be seen immediately. Many people spend months, even years, investigating business opportunities before choosing one that will meet their needs. When they are ready to start, having a waiting period gives the impression that there may be something wrong with their choice. That creates doubt and insecurity. There are no "secrets" with AtHome America, and anyone interested in becoming a consultant has access to all of the information necessary to make an informed decision. The waiting period is unnecessary.

Secondly, I was surprised to learn that the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. There are several reasons for my concern—namely, this will limit my ability to do business throughout the country, and I am also uncomfortable disclosing personal identifying information of customers to prospects.

The success of my business depends on relationships that I develop and maintain with customers and consultants. Those relationships are fragile, and in our free marketplace, clients can choose another avenue to purchase items for their home when they are not satisfied with service. That is wonderful and allows our economy to thrive. However, why would my customers want to continue purchasing from me if they can go to a retailer to shop where they have little concern of their personal information being shared with others they know nothing about? This element of the proposed rule alone could cause tens of thousands of independent direct selling consultants to lose their businesses.

Please consider reevaluating the proposed new rule as it is currently written. I certainly see the need to protect consumers from fraudulent practices—I have benefited personally from the protection of the FTC. However, direct sales companies would not be the thriving part of our world economy that they are if consumers did not feel safe both purchasing and starting their own businesses with those companies. There must be alternatives that would allow consultants like myself to continue building strong, honest businesses while protecting consumers.

Thank you for your time and consideration.

Sincerely,

Tracie Penunuri, MSW
AtHome America Executive
Certified Social Worker