

Jennifer Baur
Independent Crew Member
Noah's Ark Animal Workshop

June 14, 2006

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 Noah's Ark Animal Workshop Independent Crew Member. 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 Noah's Ark products.

I only recently joined Noah's Ark Animal Workshop after my sister shared her excitement with me about the company; prior to hearing about Noah's Ark, I'd never considered being part of a Direct Selling Company. Originally, I became an Independent Crew Member in my company because I felt the products were exceptional and I wanted to earn some additional income. My hope is to one day be able to leave my full-time job and manage my Noah's Ark business, so that I can be at home with my son but still contribute to the household income.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Independent Crew Members. Noah's Ark Animal Workshop sales kit only costs \$129. 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 compensation plan. I also think this seven-day waiting period is unnecessary, because Noah's Arks Animal Workshop already has an 80% buyback policy for all products. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Noah's Ark Animal Workshop and will then need to send in many reports to my company headquarters. The increased record-keeping at the company's corporate office is going to lead to increased overhead costs, which will raise the cost of the company's products to its consumers.

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 Noah's Ark Animal Workshop is found guilty. Otherwise, Noah's Ark Animal Workshop and I are put at an unfair advantage even though Noah's Ark Animal Workshop 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, and am even more uncomfortable about my information being given out without my knowledge. 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 Noah's Ark Animal Workshop 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 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,

Jennifer Baur