

Vista Hepburn

June, 15, 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

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Dear Sir or Madame:

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 Independent Sunrider Distributor. I also understand that part of the FTC's responsibilities are to protect the public from "unfair and deceptive practices," however some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Sunrider products.

I find the seven-day waiting period to enroll new Distributors, both confusing and burdensome. The cost of purchasing a Sunrider Starter Pack is only \$140.00 and even that is not necessary to become a distributor. I can purchase a new product from any store; like a car, television, even new furniture and the waiting period is not seven-days. Sunrider has a very generous return policy with any product that a customer does not like. Also, anyone returning product to me, I gladly return their money.

Another problem with the seven-day waiting period is the administrative burden of keeping very detailed records when I first speak to someone about Sunrider, then sending numerous reports to Sunrider headquarters.

The proposed rule also calls for the release on any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone can be

sued for almost anything. I do not believe that I need to disclose these lawsuits unless I am found guilty. I believe that would be an unfair advantage for both Sunrider and me.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. (I truly do not know exactly what or why you would want this) and I could provide references, however I am uncomfortable giving out personal information on individual who have entrusted this information to me. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Sunrider 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 sales person: "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.

I have been an Independent Sunrider Distributor for more then 10 years. I became a distributor of Sunrider because of their wonderful product line. I love the products and have continued to use then daily for more then 10 years. Because of my love of the Sunrider products, I shared with many of my friends and family and have earned additional money. This additional money has become important to my family's well-being and I feel that this bill R511993, if passed, would greatly hinder me from continuing to do business.

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

Vista Hepburn