

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)  
Re: Business Opportunity Rule, R511993  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

June 23, 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 Weekenders Coordinator. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Weekenders products. Once again, the government has decided to add more rules to an industry on the whole then take the time to better police and control Direct Selling business that do not have ethical business practices.

One of the most confusing sections of the proposed rule is the seven day waiting period to enroll new Coordinators. Weekenders Sample Pak options range from \$150 - 488. A lot of other Direct Sales Companies have basic kits starting at only \$50.00. People buy TVs, cars, and other items that cost much more than that and they do not have to wait seven-days. What about all the buyers remorse from the cable home shopping companies? Do those customers have to wait 7 days before they can receive their purchases? This waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary, because Weekenders already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Weekenders and will then have to send in many reports to Weekenders headquarters.

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 Weekenders is found guilty. Otherwise, Weekenders and I are put at an unfair advantage even though Weekenders has done **nothing** wrong. Plus this is more information my company has to supply to me, along with our basic information packets.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Coordinators nearest to the prospective Coordinator. 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 Coordinators, I will need to send the address of the prospective Coordinator to Weekenders 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 live in an area where there are few Weekenders Fashion Coordinators, and have a wonderful opportunity to share a great business in my area. How far does the FTC deem “Nearest”? In a 20 mile radius It’s me and 2 others. That’s it.

I have been a Weekenders Coordinator for more than 8.5 years. Originally, I became a Coordinator because I like the products and wanted to earn some additional money. Now my family depends on this extra income to supplement our budget. The area I live now has a lot of young families. The major area for employment is about 45 min. to one hour away – one way. Direct Sales, regardless of the company, offers an opportunity for families to save gas, spend more time with each other and earn extra income. In this day and age, why do you want to deter people from these opportunities?

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. The Direct Selling Association does a great job weeding out the companies that are out to defraud the public with false claims in income and bonuses. I am confident that you will work with them to better police companies making false statements. This ruling is not the right answer.

Thank you for your time in considering my comments.

Sincerely,

Laury Hart  
Fashion Coordinator with Weekenders USA Direct Sales Company