

DERI DORIY, RN
ARBONNE INDEPENDENT CONSULTANT
DISTRICT MANAGER

Deri Dority RN, BSN, BS

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Dear Sir or Madam,

I am writing this letter to express the deep concern I have over the proposed Business Opportunity Rule R511993. In its present form it would prevent or greatly hinder me from building my business as an Arbonne Representative. I know that the job of the FTC is to protect the public from unfair practices or deceptive acts, but it seems that this Rule is an extreme form meant to destroy the chances of people who are building business's in Network Marketing. It seems unfair to punish an entire industry based on the unfair act of a few dishonest people. In all industries there exists a small minority of dishonest people that try to take advantage of others (car salesmen, loan companies, credit card companies with interest rates up in the upper 20% rate etc.) And yet while there is very little regulation in interest rates, I find it interesting to see such an extreme Rule come out against an entire legitimate industry.

Because I am a nurse I can only compare this rule to my industry. I have been a nurse for 27 years in ICU and for that length of time I have virtually destroyed my back. I am going to take each rule and apply it to a hospital.

- First the 7 day waiting rule (which I found very confusing) If a nurse signed up at a hospital and had to wait 7 days what might she be thinking? Maybe she would think that she needs to be in another type of nursing, such as home health or office nursing. In the meantime, the hospital would be required to keep detailed reports that would add in extra cost to a health care system that is already strained financially.
- The Litigation Information rule would be quite interesting to apply to a hospital. This rule alone would insure that no nurse would ever work in a hospital. In this day and age, people sue for anything and everything. In fact, there are some people that make a profession of it. So even if the hospital was not found guilty they would have to disclose to potential employees the multiple law suits that they handle in a year (this would be big enough to be in a book form).
- And then comes the reference rule. This means that the hospital would have to supply references to each potential employee. In an age where identity theft is rampant, this section particularly bothers me. To think that my name and information would be going out to a total stranger is appalling.
- I noted that there was also a section to require the number of purchasers that have cancelled within a 2 year period. Now this would be particularly interesting in the health industry. Since many hospitals have a 50-70 percent turnover rate for nurses per year, this would send the potential employee out the door, and maybe drive them out of nursing forever.

I know I am comparing apples to oranges here but this is how the potential consultant would view this set of rules.

I got into Arbonne for the price of \$29 dollars, much less than it costs to fill my small Subaru with gas (which is an industry that clearly has taken advantage of millions of people). My goal is to pay down my debts. In order to pay down my debts at work, I have to work 16 hour shifts, which make it dangerous for the patients (increased medicine errors for nurses working over 8 hours), but is also dangerous for me. Many of times I have caught myself falling asleep at the wheel on the 45 minute drive home.

I have only been in the business a few months, but so far I have met nothing but hard working, honest people that are there for me when I need help. The products I deal with are of the finest quality. I have tested most of them and use them throughout my house. I have been taught by Arbonne to spell this business out as it is. It is not a get quick rich scam, it takes hard work and time to build the business. I have only had two customers return products. One because the pump wouldn't work, and the other because the bottle broke in her suit case while she was traveling. Arbonne quickly replaced both products without question and without the requirement that they send back the other products.

During this time, through free training, Arbonne has taught me communication skills, Leadership skills, team building skills and a vast knowledge of the product line that they carry.

I appreciate that your agency is trying to regulate unfair practices, but I feel that this rule unfairly targets an industry that has grown in its practice and prides itself in integrity. The few people that do violate the rules of the companies are dealt with by their parent company. Anyone who violates the code of ethics that is an integral part of our training, are terminated from our company. I have many friends that are selling candles, scrap booking and other products through direct marketing and I have never witnessed any unfair practice on their part.

I urge you to reconsider this ruling. It singles out one industry and puts undue burden on the honest individuals that are trying to build a company.

Respectfully,

Deri Dority RN, BSN, BS
Arbonne Independent Consultant