

July 4, 2006

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

RE: Business Opportunity Rule, R511993

To Whom It May Concern:

I am proud to be an American, and am so thankful that in this country I have the opportunity to have my own business and be able to improve my family's income. However, I am very concerned about the Business Opportunity Rule R511993 you have proposed and its effect on my continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rules are too restrictive.

The 7-day waiting period to sign up new Consultants will make it nearly impossible for me to conduct my business. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong the Arbonne opportunity. We are a legitimate business providing viable income for many people.

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. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I became an Arbonne Independent Consultant 2 years ago. My husband had lost his job and we were in a financial mess. We lost our home and if it hadn't been for the Arbonne business, we would have declared bankruptcy. I'm glad to say that we are now able to pay back our past debt, and can look forward to better things in the future. I have developed a team of over 1,000 Independent Consultants across the country and together we are offering hope to families everywhere. I trust you can see the benefit of businesses such as ours for our fellow citizens.

I appreciate your work in protecting consumers, but this proposed new rule would have many detrimental consequences. I'm asking you to find alternative means to resolving the outstanding issues at hand.

Thank you for your time and consideration.

Sincerely,

Haven Howard