

July 5, 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

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. This new rule, although well intended, represents a significant burden to the free market trade. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts of practices," but some areas of the proposed rule will make it difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. This proposed rule basically means I have to sell someone twice on the idea over a nominal amount of money and the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. One thing that is so appealing about Arbonne is I'm not consumed with unnecessary paperwork, so I have the extra time to build my business, and capture the enthusiasm and immediate results prospects experience with Arbonne products: under this new ruling I will be consumed with unnecessary paperwork and the waiting period, which will slow the growth of my business.

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. In this lawsuit-happy culture we live in a lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something.

Lastly, 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 give out personal information about individuals, without their permission of knowledge, to strangers. I know I personally would not want someone sharing my personal information with people I don't know and if I thought this was going to happen I would not want to be involved with the company. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. Once again, slowing the growth

of my business. Personally, I find this an invasion of privacy, to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for a little over a year. I became a Consultant because I love the products and my family was in need of a second source of income to help defray the rising costs of insurances. My family's income has been affected by the multiple hurricanes we have had in Florida over the past couple of years and quite honestly my husband's business will probably never be at the potential it was. Since starting my Arbonne business, I have developed a team of over 1,000 consultants across the country and together we are helping our families enjoy better lives. I am thrilled at the opportunity I have building a home based business and helping others start a business and become successful while enjoying great products and friendships.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me. I understand there are fraudulent groups out there but this proposed rule would unfairly target legitimate direct selling businesses.

Thank you for your time and understanding

Sincerely,

Lois Dye