

Donna L Bradley

June 29, 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 in regard to the proposed Business Opportunity Rule R511993. I have been an Arbonne Independent Consultant for only 21/2 years and the incredible, positive changes it has brought to my life as well as the lives of many people I have met through this industry are nothing short of amazing.

I understand that the FTC is responsible for protecting the public from "unfair and deceptive acts or practices." I truly appreciate this especially in today's world where dishonesty and scams are prevalent; however, I believe that this ruling could prevent me from continuing as an Arbonne Independent Consultant as well as many other consultants who are conducting a home based business both ethically and responsibly.

This is very upsetting to me since I have seen so many people in my business and in the industry have their lives positively changed in many ways.

I started my Arbonne business in October of 2003 having no experience in network marketing; actually, I did not even know what network marketing was. What I have seen in this industry is that ordinary people can learn how to build a business along side of what they are currently doing and take control of their finances and their lives if they are willing to work. Through free training and support from Arbonne's home office and by consultants sharing ideas and knowledge, we are all learning business skills, learning to communicate with people, building relationships, and experiencing personal growth that is priceless.

I had a house cleaning business for 18 years. Being self employed had some benefits but also had a lot of drawbacks such as just making ends meet, not being paid if I was sick, and only being able to fund the minimal amount for my retirement.

With the financial benefits our Arbonne business provides, my husband and I are able to volunteer our time, donate money to charities, and be more active in our community since we have more time. I have also been able to help friends who were struggling financially to stay home and raise their children have more choices by starting a home based business versus have to pay for childcare and making minimum wage.

One section of the proposed rule that seems very restrictive is the 7-day waiting period to sign up new Consultants. I have several consultants on my team who were so excited after trying a sample of the products and seeing such a difference that they wanted to sign up right away. Some signed up just to have the opportunity to order their products conveniently from their home, save money and have them shipped directly to them while others wanted to start their own business right away. Arbonne Starter Kits cost a nominal amount of money and on the application it is stated that they may cancel their application within 3 days. I believe the proposed 7 day waiting period would limit my ability to grow my business. I also believe this gives the impression that there might be something wrong the Arbonne opportunity. Under the proposed 7 day waiting period requirement, I would need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up.

The proposed ruling also requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am happy to provide references but in today's society, identity theft is a very real concern to many people. I am uncomfortable giving out personal information about individuals to strangers without their knowledge, not to mention privacy issues involved. I also believe this could damage the business relationship of references with those involved in other companies, not to mention give an unfair advantage to competitors. I would need to contact Arbonne, send the address of a prospect to the Arbonne corporate office in California and wait for the list. 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" Again, this would cause concern about privacy to disclose personal information for my business purposes.

Finally, the proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation or unfair or deceptive practices. This does not distinguish whether or not the company was found innocent or not. I fear the impression of a lawsuit may imply wrongdoing even if the company has done nothing wrong.

I appreciate your time and that the FTC protects consumers but I believe this proposed new rule would have unintentional consequences that would affect millions of successful network marketers or live life with integrity.

Thank you for your time and understanding.

Sincerely,

Donna L Bradley