

Kathy Corwin

July 7, 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 concerned that the FTCs proposed Business Opportunity Rule (R511993) could end or ruin my independent USANA Health Sciences business, which is a successful business that I have operated for more than 10 years. I understand and appreciate the FTCs responsibility to protect the public from unfair practices, but I believe the rule goes too far in trying to protect the public by placing unnecessary requirements that will make it very difficult, if not impossible, for me to sell USANA products.

One of the most confusing requirements is the seven-day waiting period to enroll new independent USANA Associates. This waiting period gives the impression that there might be something wrong with USANA's business plan. I also think this seven-day waiting period is unnecessary, because USANA already has a 100% buyback policy for all products including sales kits purchased by a salesperson within the initial 30 days and a 90% buyback for products purchased within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records of when I first speak to someone about USANA and will then have to send in many reports to USANA 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 any reason. It does not make sense to me that I would have to disclose these lawsuits, unless USANA is found guilty.

In conclusion, the proposed rule requires the company to disclose to each prospective independent USANA Associate, the names and contact information of a minimum of 10 previously enrolled independent USANA Associates who live nearest to the prospective Associate. 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, sharing this type of information with business prospects who may be involved in other network marketing businesses creates an opportunity for those prospects to recruit enrolled USANA Associates away from the USANA opportunity. USANA considers the names of its independent Associates to be confidential and trade secret information, and a requirement to disclose this information for this purpose makes it very difficult for USANA to protect its trade secret information and this could damage the company's business. People are very concerned about the privacy of their personal information and the potential for identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been an independent USANA Associate for more than 10 years. Originally, I became a USANA Associate because I like the USANA products, and I decided to get involved with the opportunity to earn some additional money. Now my family depends on this extra income to supplement our budget.

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.

Thank you for your time in considering my comments.

Sincerely,

Kathy Corwin