
Christine H. Satiro

July 9, 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

The reason for this letter is to voice my concern re: the proposal of Business Opportunity Rule, R511993. I am an Independent Associate for USANA Health Sciences and, after reading this rule, I have determined that it will severely impact, in a negative way, my business and my ability to earn a living. For your information and consideration, following are the ways in which I see how this ruling would personally affect my business:

Business Opportunity Rule, R11993 Requirement to provide disclosure statement	Impact on multi-level marketing small business owners
<ul style="list-style-type: none">Contract signing requirement of 7 days before prospect can enroll as an independent associate.	This time frame exceeds any other requirement for contract signings in the U.S. that I know of. Precedent is currently that anyone can sign any contract presented to them and always have the recourse of canceling it within 3 days for all other businesses. The same should, and currently does, apply to my business. Imposing a 7 day limit BEFORE signing is excessive and not in keeping with general law. This sends an unspoken message to the prospective customer that there is potentially something wrong with this business and they should think twice before joining it. Our business model sells directly from the manufacturer through independent associates to the customer and is as legitimate as any other consumer products sales business model in the retail industry.
<ul style="list-style-type: none">Requirement to list all criminal or civil legal actions against USANA with past 10 years.	This puts undue focus on the negative legal action without the balance of providing the resolution of each action and is unfair.
<ul style="list-style-type: none">Requirement to provide the number of associates who have cancelled their distributorship or sought a refund in the last two years.	No other retail business provides this information when I buy their product either in a brick and mortar store or online.

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<ul style="list-style-type: none">• Provide list of 10 current or former USANA associates who live closest to my prospective customer or business partner.	<p>I cannot now request the names and addresses of the current USANA Associates who are in my area as USANA carefully guards our personal information...better than some other organizations. So, why should I have to locate and present other USANA Associates to my prospective customers? This could potentially have two negative results:</p> <ol style="list-style-type: none">1) A former Associate may have negative things to say about the company which may or may not be true, but which information is not required to be substantiated by anyone.2) A current Associate may be very satisfied with the company and their business and have a large organization which they describe to my potential customer.....my potential customer could decide to join their team instead of mine.
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I am working very hard making contacts to begin my USANA business so that I may transition to running an independent business instead of working for an hourly wage. The cost of living has increased far in excess of my current income. I am passionate about improving health care in the United States and this is one way in which I can make both a living and a contribution with the USANA nutritional supplements. This business is very important to me and to my family's future. Please allow us to have the reasonable business opportunities that we currently have so that multi-level marketing associates can work toward having just as successful a life as other classes of business owners.

Sincerely,