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July 1, 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.

I joined Avon as a new mother, 28 years ago, in the summer of 1977. After looking into several other home business opportunities, I chose Avon. It was such a small investment, at that time \$20 for the Start up Kit, and was a company I knew had an excellent reputation, as well as quality products. When I started I didn't even have a car, but would stroll my toddler around the neighborhood to make sales & meet our neighbors. It was slow going, but thru persistence we built a nice extra income. From those first small orders, I have built my Avon business to the point where it is no longer just extra pocket money but is now equal to my husband's income, as a School Administrator. We depend on it and see it grow year after year.

I believe the FTC proposed rule would prevent me from continuing on as an independent Avon Sales Representative. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult, if not impossible, for me to continue selling Avon products, as well as mentoring others to do the same.

I believe the rule would be a huge detriment to my business if some of these proposals are required. A business opportunity like Avon that now requires only \$10 for start up supplies, is a like a dream come true for many new entrepreneurs. Where else can you build a 6 figure income from such a small investment? A 7 day waiting period just seems so silly when you are talking about \$10 "lunch money".

Another proposed rule section requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. This would be such a nightmare to track and keep up with, and in my eyes totally unnecessary. My new recruits are always given several numbers to call with any questions they might have. It is to our benefit to keep them well informed and motivated, as we want them to continue to sell Avon and be a part of our group as long

as possible. Identity thefts and privacy issues are so much in the news these days, that requiring us to give out names & phone numbers, especially of new recruits is a tricky thing. I cannot imagine anyone would be willing to give permission, I know I would not, if I were starting Avon today. However, since Avon has no requirement or commitment in regards to staying with the company, any new representative can quit at anytime with no penalty.

I understand the need for the FTC to protect us consumers. I also see a lot of new multi-level and direct sales companies popping up each year. Many of these are not built on solid foundations and premises. A company such as Avon, with the respect & history we have in over 120 years of business...it just does not seem fair that we fall into the same category as new and not yet established direct sales companies. We should not be bound with these new rules that will harm our thriving home businesses. Our businesses are based on trust and respect. It is repeat sales with customers we see over and over again. With Avon it is all about relationships, so "unfair and deceptive acts or practices," are not an issue. I do appreciate the work of the FTC to protect consumers, but I believe this proposed new rule harms good companies such as Avon and that there must be a way to accomplish your goals without harming innocent hardworking Representatives.

I do hope that you will reconsider these new rules. The long and honorable history of success that Avon enjoys, being the first company to empower woman to run their own business, even before they had the right to vote, sets us aside. I believe this company has always set the bars higher for other direct sales ventures and they have always been known for their integrity in business as well. Avon is well known for so many contributions to society today, especially their "Breast Cancer Crusades" and "Speak out against Domestic Violence" programs.

It seems there must be some alternative to these proposed new rules that would allow the FTC to achieve their goals, as well as allow us to run our businesses as successfully as we have in the past. As they are stated today, they will be a huge burden to overcome, and many of us will not be able to make it.

Thank you for considering my comments, they are heartfelt.

Sincerely,