

Jude Bewlay  
Regional Vice President, Independent Consultant

July 6th, 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 have been an Independent Consultant with Arbonne International since February 2004. I became a Consultant because I love the products and I saw the opportunity that Arbonne offered for potential income. Since starting my Arbonne business, I have developed a team of more than 20 Independent Consultants, as business builders, and no one I have signed up has subsequently expressed disappointment with their relationship with Arbonne. All of these consultants are looking forward to continuing to generate an income for their families in the unique and flexible manner network marketing affords.

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that this could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very 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. Not only do Arbonne Starter Kits cost only \$29, but the proposed waiting period gives a negative impression for our industry. It seems unreasonable when compared to the waiting period for other purchases such as buying a house (3 days) or buying a car (0 days). Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products. A waiting period would limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. What happens if the company was found innocent? The mention of any lawsuit implies wrongdoing and it seems unfair to disclose lawsuit information unless the company has been found guilty of something. We would be penalized by the impression a lawsuit, even if we have done nothing wrong.

Finally, 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 I am

very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers, because of the reality of identity theft today. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. 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. 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" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

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.

Thank you for your time and understanding.

Sincerely,

Jude Bewlay