

Waynella McNeil  
Momentum LLC

July 10, 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 and disagree with the proposed Business Opportunity Rule R511993. I have been a Unicity Distributor for over 7 years and have never had someone request a refund for their enrollment as a distributor!

I believe that in its present form, the Business Opportunity Rule could prevent me from continuing as a Unicity Distributor. I understand that part of the FTC's responsibilities 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 sell Unicity products.

#1. The seven day waiting period to enroll new distributors is confusing and burdensome. Unicity sales kits are only \$40 for new Distributors. This waiting period gives the impression that there might be something wrong with my business model. Unicity has a 100% buyback policy for new Distributor kits in place; therefore, this seven-day waiting period is unnecessary. This would also cause extensive and unnecessary paperwork – something all independent business owners want to minimize.

#2. 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 innocent of any wrongdoing. It does not make sense that I would have to disclose these lawsuits unless Unicity is found guilty. Unicity and I are put at an unfair advantage even though Unicity has done nothing wrong.

#3. Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Unicity headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as Distributors: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

**Please note, I personally have been a victim of identify theft and I am very reluctant to agree to the above.**

I have been a Unicity Distributor for more than 8 years. Originally, I became a Unicity Distributor because I liked the products and wanted to earn some additional money. Now Unicity is my main source of income.

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,

Waynella McNeil