

**Dennie Marks
Arbonne International**

July 11, 2006

Dear Sir or Madam:

I am writing because I am concerned about the proposed Business Opportunity Rule R51193. I believe in its present form, it 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 difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the confusing and most restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there could be something wrong with the Arbonne opportunity. Under the 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 of my success up to this point is capturing the enthusiasm and immediate results prospects experience with the Arbonne products; the waiting period would potentially limit my ability to grow my business.

This 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. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I Fear being penalized by the impression a lawsuit would leave, even if I 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 identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. 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 a 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 have been an Arbonne Independent Consultant since February, 2005. I became a Consultant because I love the products and considered the result oriented products an asset to me and anyone who I'd share them with. I also projected Arbonne affording me the ability to withdraw from a business I have worked for the past 20 years and give me income I never enjoyed before. Since I started with Arbonne I have developed a team of 71 Independent Consultants in various places in the country and together we are helping our families enjoy better lives.

I truly appreciate the work of the FTC in protecting consumers, but I strongly believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means of resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like.

Thank you for your time and understanding.

Sincerely,

**Dennie Marks
Arbonne International
Independent Consultant**