

July 12, 2006

Michelle Wilber
Lia Sophia Jewelry

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Lia Sophia Jewelry Fashion Advisor/Unit Manager. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Lia Sophia's products.

I have been a Lia Sophia Fashion Advisor for more than 4 years. Originally I NEVER thought this was for me. Sure I loved the jewelry...especially the great discounts and I felt the products were exceptional. However I was working a job that I thought I had to just deal with, my life was soooo crazy, working 60-70 hours a week, spending two and a half hours a day in my car driving back & forth to work. Basiacly spending more hours on the road than at home enjoying my family. Racing to make it to work on time, paying the monthly bills, and trying to find time to spend with my husband & family...but I just kept thinking about something I had heard at that **lia sophia** Show. The Advisor said that she was making more money working 2-3 days a week with Lia Sophia. I started imagining what it would be like to work from home & spend more time with my husband (we are newly weds mairred July 5 2003). Not always running late. Not behind on the bills. Not missing the important things. Now I can say because of Lia Sophia I've become the wife, and friend I always wanted to be. I'm in control of my time-and MY INCOME. I enjoy terrific discounts. I wear beautiful jewelry. And, I'm helping others too.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new advisors. Lia Sophia starter kit only costs \$99. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Lia Sophia and will then need to send in many reports to my company headquarters.

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 found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Lia Sophia is found guilty. Otherwise, Lia Sophia and I are put at an unfair advantage even though Lia Sophia has done **nothing** wrong.

[References] 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 the 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 [DIRECT SELLING COMPANY NAME] 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 a salesperson - "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.

[Conclusion] I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

[Your signature]

[Your name]