

Adele M. Deschamps

July 18, 2006

Federal Trade Commission/ Office of the Secretary, Room H-135 (annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Business Opportunity Rule, R511993

Dear Sir or Madam,

I have recently become aware of the proposed ruling concerning network marketing, Business Opportunity Rule, #R511993.

I am writing to voice my personal objections to the proposed rule. This rule would have disastrous results in my business. In the effort to educate people about how the body responds to nutrition, I often share with them about Sunrider products. When they respond with interest in learning more, I invite them to meet with me and discuss the opportunities Sunrider affords. A waiting period beyond that date is not only useless (because there is already a very generous 60-day money-back return policy in place with Sunrider), but is **offensive to the person considering beginning a business**: It makes an assumption of incompetence on his part, to make an adult decision concerning business pursuit or the spending of a mere \$140! The proposed waiting period would be an undue burden, not only to me, but also to the potential consumers of these products, who are eager to begin trying for themselves to find the personal benefits of the products and the business opportunity.

If the proposed rule is implemented, much of what I now do will then become illegal, impossible, or I will be constrained to keep truly unjust rules concerning financial disclosure to these people I have shared with, that would put my business in jeopardy (the "earning claims statement"). This requirement would be expensive and time consuming, and would indeed *not* provide the wished-for protection for the consumer.

Let me hasten to add that what I do now in sharing with people is NOT illegal; I am very much aware of the need for potential consumers and businessmen and women to be fully advised of all aspects of the business practices and claims made by Sunrider, as well as those things which are *not* claimed, and *may not* be. I am careful to adhere to all rules and laws which apply, as Sunrider also is.

I do not see how it would be possible to pursue Sunrider as a business, under the proposed rule. Even my effort to simply help someone understand how to help themselves with the excellent nutrition Sunrider offers would become a burden to both me and them. I have personally been consuming the products Sunrider offers for about 18 years, and because I enjoy them so much, have also shared them with many others. I make it my practice to simply assist any who are interested, in pursuit of health changes they wish to make and in pursuit of financial benefit as well. There is absolutely no pressure on them, or anything wrong with what I do. I am confused and perplexed that the FTC wishes to place this burden on my effort to help my fellow man.

The section that requires me to provide a "full disclosure" of records of others who have joined as distributors would not only be **an invasion of my personal rights to do business legitimately**, but **also an invasion of the privacy of those others who are already distributors linked to me!** In addition, it would be an **undue burden to the new prospective business person**, and **would likely prevent him/her from deciding to try the business for himself**, because of the burden of having to give personal information to whomever the rule

demands he give it to. There is so much fraud and identity theft already rampant in this country, I am decidedly uncomfortable myself, with this disclosure rule!

I do not understand why there is the effort to make distributors of Sunrider products provide full disclosure of any and all lawsuits ever *filed* against Sunrider. This is tantamount to making me admit that anyone who, for any reason whatever...jealousy, spite, whatever...has *filed suit* against the company was **right!** The records stand, and are available to anyone who wishes to know. Why would you burden me and others with the needless effort to degrade a company whose integrity is truly above reproach, as I believe Sunrider is in its business practices? This is unconscionable.

In conclusion, this rule would be an **undue and illegitimate burden** to place on distributors of Sunrider products, and **would not at all promote the goal for which it is purportedly designed**, to protect the consumer. There are already sufficient protections in place, both by Sunrider and by the FTC, to protect consumers from any possibility of fraud or deceit on the part of distributors.

Please do not implement this rule.

Sincerely,

Adele M. Deschamps

Cc: Sunrider International