

July 10th, 2006

Dear Sir or Madam:

RE: Business Opportunity Rule R511993

I am concerned about some sections of the proposed rule that will make it very difficult to continue my business, representing BeautiControl Cosmetics, Inc. I am an independent certified spa and image consultant with BeautiControl. I have been a consultant for over 16 years. I understand there are some companies out there that have deceptive practices. BeautiControl is not one of them. By lumping 'all direct selling companies' into a category will hurt 60% of homes in the U.S. and all the direct selling companies. When the economy is tight, consumers buy from direct sellers because they get benefits along with great prices and high quality. This proposal could seriously hurt the economy.

I was partially disabled in a car accident and could not continue any type of work for more than 2 hours at a time. I was working as a cosmetologist, also a dance instructor, and in sales (which required lifting about 30 pounds). Having to give those up was very difficult. That is why I feel so blessed to have found BeautiControl. I still help people look and feel better, I earn a small income, feel independent and am happy doing something so rewarding. This has been terrific for me and my family, I have had surgeries, moved 3 times for my husband's job to a new city, and have been able to be a very involved parent of a gifted child. All this would not be possible without an "at home" type of work. BeautiControl is one of the best companies in America for women. Did you see the June issue of Empowering Women Magazine featuring this fantastic company?

The 7 day waiting period to enroll new consultants will hurt all direct sales companies. BeautiControl consultants are not pressured or lured into huge inventory shipments or auto-delivery programs to put them into debt, like some other companies. We are a company that 'helps' and 'encourages' women to strive to do and be more. Having to wait for 7 days is wrong. Can you imagine going to look at new cars, finding one that is perfect, a dream come true, and then being told you have to 'wait 7 days to purchase it'? Imagine having to wait 7 days for a new meal at your favorite restaurant. Imagine being told you have to wait 7 days to buy some kind of medication. Imagine being told you have to wait 7 days to look at a house you want to buy, or even being told you have to wait 7 days to make an offer (and then someone else makes an offer and you don't get it because you had to wait)! **What if you wanted to buy a computer – it is a good investment, something you have to look at and decide if this particular one is right for you and your needs – then to be told "come back in 7 days"! What would you think? Maybe there is something wrong with it, the company selling it, or that it is a much bigger commitment or harder to return (or get out of) than it really is. This is absurd! Can you get a "90% buyback policy" when purchasing a computer? NO. We just spent \$1,600 on one, and it is really messed up from the 'geek squad' not knowing much about the new Media Center program on it – we are stuck with it. Had this been me joining BeautiControl, I would have gotten my money back, if that is what I wanted, or I could just 'not order' to stay on 'active status'.** Half of my team of consultants were previous purchasers. They chose to become consultants when they saw the opportunity and how fun and easy it was to make money doing what I do. Are you proposing that I have to make my clients, who have been thinking of joining my business for a while, wait before they can? With our company, you invest \$250.00 and it is valued at about \$800.00 when you include all the extras you get besides the full size products to demonstrate with. When someone wants to try this, they get a good deal, and it is not hard to remove yourself from the company. You should figure out a different way to protect consumers, without harming the whole direct selling business.

The section about lawsuits is also wrong. Anyone can sue anyone these days. People are just trying to find someone to sue to get some easy money and not have to work. Does that mean that the person or company they are suing is in the wrong? No. (Look at all the people on **welfare**. Most are pretending to look for work, but will have more money if **you** give it to them. Many of them just keep having children to get more government money, and they spend the money on drugs, fancy cars, expensive and luxury items that my taxpaying, lawabiding family cannot afford)

Another proposed section is about 'disclosing the 10 prior purchasers'. With all the identity theft, and underhanded competitive direct selling companies out there, it would create more trouble than it would benefit anyone. Are you comfortable with me giving out your personal information to a total stranger, without your knowledge of who they are? Do you have time to call someone and ask them to be a reference to 'Mary Smith' and then give her info out to you and vice versa...? I know I don't.

The sentence "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers," will deter many people either from buying or joining to sell a product. I pride myself on the type of "service" business I offer. My clients know and love the fact that I am an individual (not a huge company, whose customers are but a number). I give personal service and attention, as well as confidentiality.

The section on disclosing all the people who have quit or dropped out of the business is stupid as well. That is what makes a direct selling situation so attractive – you can ‘try it for a while’ to see if it fits your needs and lifestyle. Sometimes we go through major life changes, and consultants drop out for whatever reason, and then re-join when life settles down. Should all companies just hand out information to prospective employees (whether they ask for it or not) on how many have been hired, fired, and quit for a certain length of time? That is just a lot more information and paperwork to keep track of. In some businesses, like restaurants, you have a high turn-over rate. Are they going to be required to present this information?

I appreciate the work the FTC does to protect consumers. I just believe this new proposal needs to be adjusted so there are not so many burdensome, unintended consequences. Please continue to work on protecting consumers, but don't punish such a large group of citizens who want to do and be more with their life, like me. I feel we need to address more issues dealing with illegal aliens and terrorists.

I have dreams of earning even more money, building a successful team of consultants in my area, being a role model for my offspring, and for my team, neighbors, relatives, etc. Many of the proposed portions of Rule # R511993 will make most of the direct selling business very, very difficult. If that happens, I will have to go through the process of getting a ‘fully disabled’ classification, or live off welfare, either way, the government would be paying. Surely you can find some ways to protect individuals without harming the whole industry. **Isn't it better to ‘help people help themselves’ than to limit their possibilities and tell them what they can and can't do? Is it right for YOU to shatter someone's dreams?**

Thank you for your time considering my perspective on this matter.

Respectfully,

Maria Gross