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July 17, 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:

We are writing because of our concern about the proposed Business Opportunity Rule R511993. This rule in its present form could prevent us from continuing as health coaches for Take Shape for Life. We realize the FTC's responsibility to protect the public but some of the sections in the proposed rule, if enacted, will create difficulties for us to continue to provide a valuable service to the public.

The proposed rule calls for the release of ANY information regarding lawsuits involving misrepresentation or unfair or deceptive practices, with no regard to innocence on the part of the company. To be required to disclose any lawsuits even when Take Shape for Life is found innocent creates an unfair disadvantage to our business.

Also, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. We are always inclined to provide references to prospective clients of those current clients who have given their consent to be contacted. However, I am very uncomfortable providing confidential information to prospective clients without the approval of current clients. This practice could potentially harm references businesses that may be in competition with the prospective purchaser.

We also believe that the following sentence required by the proposed rule will prevent many people from wanting to sign up as a health advisor for Take Shape for Life - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." With concerns about privacy and identity theft, prospective clients will be reluctant to share their personal information with individuals they may have not yet met.

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My wife and I have been Certified Health Advisors for Take Shape for Life for just over a year now, and have found this part-time career to be an extremely rewarding experience. Not only have we been able to improve our own personal health and well-being, we have also been directly responsible for helping hundreds of struggling individuals lose weight and regain their health. The rewards are two-fold: helping our friends, family and acquaintances improve the quality of their lives while working to improve our financial situation.

We appreciate your ongoing work to protect consumers, but we believe this proposed new rule has many unintended consequences. We believe that there are less burdensome alternatives available in achieving its goals.

We appreciate your time and consideration of our comments.

Sincerely,

Thomas Tanner

Diana Tanner