



D Rehling & Co.

Donna Rehling, Executive National Vice President
Independent Consultant of Arbonne International

Federal Trade Commission
Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I am fearful this would have a very negative impact on my business that I have worked very hard to build over the years. 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 very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business, therefore, I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant.

The 7-day waiting period to sign up new Consultants is one of the most confusing and restrictive sections of the proposed rule. I honestly feel this casts direct selling plans in a negative light. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, there are record keeping and administrative problems because 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 to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

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. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. As an independent contractor, I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

As an Arbonne independent contractor, if I am found doing anything wrong, illegal, or breach the policies and procedures that I am bound to, the company will terminate my contract. This effective "check and balance" system protects the company as well as my business from the wrongdoing of others. This is one of the *many* things I love about Arbonne. They uphold their policies and procedures and I am proud of that. I am proud to represent Arbonne International.

The proposed rule also requires the disclosure of at least 10 prior Independent Consultants nearest to the prospective Consultant. I am happy 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. Most recently I learned about two of my close friends being the victims of identity theft. This is very frightening and serious in today's world. Sharing this information could also 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 ten prior Independent Consultants, I would first 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 the seller, your contact information can be disclosed in the future to other buyers*" and prospects will be understandably concerned about their privacy. There have been some individuals that even questioned and felt uncomfortable providing their social security number on our application even though we assure them that it is only for income tax purposes and no one else but Arbonne's corporate office will ever see that information. I would find it an invasion of privacy to disclose personal data, for my business purposes.

In September of 2006 I will have been representing Arbonne International, as an independent contractor, for 18 years. I was first attracted to this company because of the high quality of products they offer. I also became aware of the companies high standards and extremely high ethics. That is when I decided to leave corporate America and start a business of my own, representing Arbonne International. I have built a team of *thousands* of Independent Consultants across the country who I am proud to say carries on Arbonne's philosophy of high standards. These fine people also are able to help others and contribute back to their communities in which they live. Together we are helping families enjoy better lives in many ways.

In spite of several health challenges throughout the years (both with my husband and myself), I have been able to continue to work my business and also be by my husbands side when he needed me the most. Had I remained in corporate America, this would not have been possible. **I am the breadwinner** of our immediate family and I am now assisting my aging and ailing parents as well. I have been able to help others financially and contribute to their family needs also. I am able to do all this because I have built a strong and solid business over the past 18 years with Arbonne.

There is no way I can go back to work in corporate America nor could I replace my current income anywhere else. I will be 60 years old on my next birthday and am dealing with health challenges that would prevent me from working outside of my home based business.

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

Thank you for your time and understanding.

Sincerely,

Donna Rehling