

I am writing to you regarding the proposed Business Rule, R511993 that is now being considered for implementation by the FTC. While I understand that this rule was provided for consideration in order to protect the public against deceptive and fraudulent practices used by businesses whose primary focus is the quick buck, the implementation of this rule would also have a devastating effect on the many legitimate businesses, offering an opportunity to have a successful business without hurting anyone in the process.

I have been an Independent Distributor in Network Marketing since 1996, with my current company being the first I've really focused on the business in. I was introduced to my company by good friends, with my best interests at heart. I began by using the product, so I would know if and how it worked and because I had a need for such a product. I knew if the product could help me, it could help most people. I began focusing on my business about a year ago and I'm really beginning to see the value of my hard work. I've learned so much from my colleagues and from the actions I've taken while developing new prospects and friends. I speak in public weekly and I network throughout the counties in my area. These are things that were never part of my work life before and have made a broad difference to my life as much as in my work. When I enrolled with my company, I was dealing with the repercussions of a car accident that seriously injured my back. I was fairly immobilized and very discouraged about my future. Network marketing gave me the opportunity to start again, something I didn't think I'd be able to manage.

There is nothing easy about a new business and probably the most important aspect of my business is that people trust me. Once the average person is given an array of required documents to consider, required documents from the FTC, their level of trust in me, in my company and my product would be seriously brought into question. Although the entire rule presents challenges in my businesses the most significant and potentially damaging aspects of the rule to my business are:

1. The **seven day waiting period** required by the rule, creates an air of suspicion and suggests a level of risk that doesn't exist with my company. The waiting period potentially effects the decision of the purchaser by way of its very existence. Some prospective purchasers want to take their time and that is their right. Others want to start immediately and that too is their right. The waiting period removes their ability to make their decision in a legitimate business.
2. **Requiring a list of references living nearest to prospective purchasers** inevitably extends the seven day waiting period in many cases. I meet new people wherever I go. If I am on the road, in areas where I don't know other purchasers, I would have to contact my company for the information, which will take time to obtain and deliver. I have no way of knowing where the people I might meet are from in advance, so I would have to contact my company each time,

which is very time consuming and ultimately impractical. Since this information will not be limited to bona fide purchasers, but will be given to anyone who might be interested, including competitors, the impact on purchasers and prospective purchasers is untenable. By requiring every purchaser to provide their name, address and telephone number without a promise of privacy and confidentiality will simply encourage prospective purchasers to walk away. It also may lead to liability for identity theft.

I very much appreciate the FTC for its efforts to protect the public in matters of fraudulent and illegitimate business practices. I also appreciate the privilege of responding to prospective rulings that affect my business. I don't believe that Business Opportunity Rule R511993 should be done away with altogether. Instead, I see it as the preface to a similar rule that is placed on businesses that have been proven borderline or guilty of such illegitimate and harmful practices. To use such a rule on all businesses selling opportunities, in effect deems them all guilty of questionable business practices.

Thank you, once again, for allowing me to respond to the prospective Business Opportunity Rule, R511993. I hope that my comments have provided an alternative to consider.

Sincerely,  
Louise Rosenbaum