

Karen Priemer

Independent Consultant, Executive National Vice President

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

July 17, 2006

Dear Sir or Madam:

I am writing this letter because I am very concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne International Independent Consultant, Executive National Vice President. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it nearly impossible, for me to sell and market Arbonne products.

I have been a consultant with Arbonne International for more than 12 years. Originally, I became an Independent Consultant in Arbonne because their products are pure, safe, beneficial and superior to anything I've found on the market, I wanted to earn some supplemental income and get my personal products at a discount. Recently, my husbands company closed and I became our families' sole income source through my direct selling business. The future of my family is dependent on the stability of the direct selling industry.

I am completely opposed and befuddled by the 7-day waiting period to enroll new consultants. This is one of the most confusing and burdensome sections of the proposed rule. Arbonne's start up kits cost only \$29. People buy a myriad of items in retail markets that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with our company or the industry. I also think this seven-day waiting period is unnecessary, because Arbonne already has a 100% return policy for all products and start kits with a three day buyback policy. They also offer a twelve months return on products from consultants. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and will then need to send in many reports to my company headquarters.

The proposed rule also calls for the release of *any* information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter we are found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Arbonne was found guilty. Otherwise, Arbonne and I are put at an unfair advantage even though Arbonne or myself have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers in this day of identity theft. Also, giving away this information could damage the business relationship of the references that may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Arbonne

International headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

Karen Priemer