

Rhonda Head
Jafra Cosmetics International

Date 7-17-2006

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a [A Consultant for Jafra Cosmetics International 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 very difficult, if not impossible, for me to sell Jafra products.

This type business dates back as far as 75 years and has given women an opportunity to work and still be able to take care of the home and children. As many things that have happened in this time frame you decide to pick on us the women. If you check you will find that the bulk of these businesses are women minority.

I have been only selling as a consultant for a little over a year after being able to retire from corporate American which does not want any of us that are in the 50+ bracket. No they can't say it but it shows up over and over to those of that age that try to get other jobs. I selected this company because I have used the product for 24 years.

In my Jafra Cosmetics company I felt the products were exceptional and I wanted to earn some additional income. Now that I am 55 years old I can get additional money to save so that I can afford to have retirement and health care

The 7 day waiting period only frustrates those who are want to get into this business. One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new [CONSULTANTS, DISTRIBUTORS, ETC.]. Jafra's COMPANY'S] sales kit only costs under \$200.00 plus they have the option to get in as low as \$50.00. They also get a product that they are wanting People buy TVs, cars, and other items 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 the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because Jafra already has a return policy for all products including sales kits purchased by a salesperson within the last twelve months.

Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Jafra and will then need to send in many reports to my company headquarters. I am contacted by many who want to sell and sign them up because they have called me and want to sell the product. Why should they have to wait seven days

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. 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 Jafra is found guilty. Otherwise, Jafra and I are put at an unfair advantage even though Jafra has done **nothing** wrong. We have been in business for 50 years.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who 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 Jafra 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,

Rhonda Head

[Your name]