

July 17, 2006

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

RE: Business Opportunity Rule, R511993
On behalf of Laura A. Ward
AtHome America, HomeStyle Specialist
9 Mulberry Lane
Atlantic Highlands, NJ 07716

To Whom It May Concern:

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 with ATHOME AMERICA as a HomeStyle Specialist. 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 ATHOME AMERICA products. This ruling will create an adverse effect on my business thus making it difficult to grow, manage and maintain my customers as well as retain HomeStyle Specialists who wish to have their own business.

I have been with ATHOME AMERICA as a HomeStyle Specialist for 1 year. Originally, I became a HomeStyle Specialist in my company because I felt the products were exceptional and I wanted to earn some additional income so I could be home to raise my son and work around family. ATHOME AMERICA has given me an opportunity to do just that and make a difference in my family's life and give us the balance we need in this day and age.

I rely on my business to help make ends meet in a world that is not exactly fair to women who choose to put their family first. It pains me to see that the many who run their businesses ethically and with high standards would have to be forced out of what they love to do as do I. It will personally hurt me as I WILL be forced to make serious changes that will affect my family immensely. The future of my family is dependent on the stability of the direct selling industry and therefore, the many millions of other women who struggle to balance home and work life. You would be making a major ripple effect in the industry should this ruling be passed. Many will leave direct selling.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new ATHOME AMERICA, HomeStyle Specialists sales kit only costs \$149. 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 ATHOME AMERICA already has a 90% buyback 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 ATHOME AMERICA 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 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 ATHOME AMERICA is found guilty. Otherwise ATHOME AMERICA and I are put at an unfair advantage even though ATHOME AMERICA has done **nothing** wrong.

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 ATHOME AMERICA 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,

Laura A. Ward
ATHOME AMERICA, HomeStyle Specialist