

Buffy Ruthardt

July 14, 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 an Arbonne Independent Consultant. 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. I know that I have been taught to work with business ethics and integrity. I am concerned about protecting the culture of Arbonne and the vast number of people that view Arbonne as their only way out of their current situation as I do.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only does it cost a nominal amount of money to purchase an Arbonne Starter Kit, the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. I believe this casts a negative light on the direct selling plan. Direct sales have offered success to so many people. This has allowed citizens not only in the United States of America, but throughout the world to seek an opportunity and express the freedoms we do have that have been fought for. Under this waiting period requirement, 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. My husband and I have been self employed for years and as everyone knows it is hard enough to keep a business prospering. I do believe that all of this is done with the best intentions. I do believe, however, that this would cause unnecessary delays.

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. I do believe this to be unfair in that it does not distinguish between winning and losing lawsuits. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad 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. I have quite a few personal friends who have had identity theft this last year and it almost puts a stop to anything moving forward in their lives. I know that as an Independent Consultant that works from my home I am very careful as to what information is given out to others. I refrain to put my street address on my business cards and signature of my e-mail.

Also, sharing this information could 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 10 prior Independent Consultants, I would 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. I would find it an invasion of privacy to disclose personal data, for my business purposes and would feel uncomfortable asking this of others.

I have been an Arbonne Independent Consultant for almost 2 years. I became a Consultant because I love the products and our family was in need of a second source of potential income. We needed a plan B. My husband works 7 days a week at our other business and our children are growing at rapid speed. We don't have much more time left with them at home. We wanted to create some time with them through the freedom of choice that we can gain through our opportunity with Arbonne. We both have a desire to support those that cannot support themselves and the organizations that help that become a reality. We have been able to improve our children's schools and building funds in our church through our opportunity with Arbonne. My husband and I want to leave more than what we found when we started this life and add value to others. Since starting my Arbonne business, I have developed a team of over 3000 Independent Consultants across the country and together we are helping our families enjoy better lives. I have seen so many people including myself become a more important part of a better America, an America with freedoms. This country has a countless number of people risking their lives and the lives of their families just to live on our soil. I don't want to see more of that freedom that is so valued taken away. I understand that there are fraudulent groups of people conducting business and I understand your point. I just do not want those with good intentions that are currently making a contribution to our society hurt so gravely in the process.

I truly appreciate the work of the FTC in protecting consumers, but 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. I believe that we should all take our part in the responsibility of providing for ourselves and also for those that are unable to. This industry, worked correctly, requires a lot of time and hard work. It requires dedication and commitment. I do so desire to keep my dreams alive with Arbonne...the dreams of my family, my friends and the many people I have yet to meet and offer this gift to. Please hear my plea.

Thank you for your time and understanding.

Sincerely,

Buffy Ruthardt