



The Premier Direct Seller of Pet Products™



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June 22, 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

Dear Sir or Madam:

I am writing this letter in regards to the Federal Trade Commission's proposed New Business Opportunity Rule R511990. As the rule stands at present, it is capable of causing Shure Pets significant and severe damage. I understand that an aspect of the FTC's Bureau of Consumer Protection is intended to safeguard the public from potential illusory practices. However, there are portions in the proposed rule that are certain to substantially impede, if not completely eliminate Shure Pets as a business.

Founded in 2002 by Andrew Shure, Shure Pets is based in Chicago, IL. After months of intense and meticulous research, official recruiting efforts for our sales force known as Pet Consultants began on September 2, 2003. Less than three years later, Shure Pets has recruited more than 1,200 independent consultants. Our products are created and approved by knowledgeable scientists and veterinary representatives, categories include: Health and Beauty Aids, Gifts, Pet Apparel, Treats/Toys, Activities, Pet Beds and Pet Lover Apparel.

The first portion of the proposed rule I would like to address is the creation of a seven day waiting period to enroll new Pet Consultants. The price of a Shure Pets beginner sales kit is only \$99, much less than "impulse" buys such as expensive electronic/technological equipment consumers in today's market make

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related to the obtainment and preservation of these records will be very expensive for Shure Pets to endure.

Additionally, I would like to broach the proposed rule's elimination of the existing \$500 threshold under the present franchise rule. According to this portion of the proposal, Shure Pets would fall under FTC regulatory authority and would therefore be forced to produce numerous pieces of documented materials in compliance. The proposed rule would utterly restructure the Shure Pets business plan in terms of distribution channel by turning our independent Pet Consultants into mere entities, forcing them to lose the control they once had over their own business.

Also, in today's world, the aptitude and availability of lawsuits, whether personal or business related, is already astounding. The proposed rule obligates Shure Pets to release ANY information regarding prior litigation and civil/criminal actions involving misrepresentation, or unfair or deceptive practices. I see little, if no, value in disclosing these lawsuits unless Shure Pets is, in fact, found guilty under the court of law. The FTC, with this obligation, has somewhat forgotten the American tradition of "innocent until proven guilty," by the indirect implication of the release of litigation information.

Furthermore, the targeted prevention of business opportunity fraud presented in the proposed rule, which requires Shure Pets to gather the demographic/geographic and earnings claims of its Pet Consultants, is an ineffective method of achieving its goal. Those who are perpetuating fraudulent business opportunities will not provide accurate data to begin with, and direct sellers such as Shure Pets, who will try to faithfully comply, will have the nearly impossible challenge of interpreting and meeting some of the proposed requirements.

Finally, in regards to the proposed rule requiring the disclosure of at least 10 prior purchasers nearest the prospective purchaser, a relatively new company such as Shure Pets is not in the position to provide such massive information due to its size. Shure Pets already refers prospective buyers to the Pet Consultant that is most geographically accessible upon their initial inquisition about the company. People are very concerned about their privacy and identity theft and so are we from a privacy litigation standpoint. Forcing Shure Pets to disclose such personal information concerning its independent Pet Consultants, would, in fact, deter and prevent many people from signing up to become a sales representative.

Shure Pets not only appreciates, but encourages, the hard work of the Federal Trade Commission in its attempts to protect consumers. Nevertheless, we believe this proposed new rule contains and will result in several unintended

consequences, all of which pose the threat of destroying our business. Shure Pets recognizes the consumer protection goals stated in the proposed rule, and we believe there are much less burdensome and potentially harmful alternatives available in achieving these goals.

Thank you for your time and consideration.

Sincerely,

Andrew N. Shure
Founder/President
Shure Pets