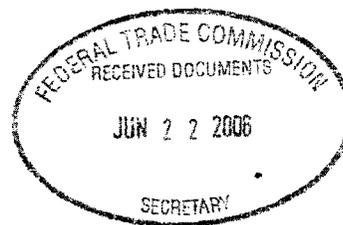




June 1, 2006



Office of the Secretary, Room H-135 (Annex W)
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: In Opposition to Business Opportunity Rule R511993

Dear Secretary:

Kitchen Fair is highly opposed to the proposed New Business Opportunity Rule R511993 because it could severely injure Kitchen Fair's and other direct selling companies.

The most burdensome section of the proposed rule is the seven (7) day waiting period to enroll new distributors and sales consultants. Kitchen Fair's sales kits are provided at a nominal cost. This waiting period breeds skepticism by creating the impression that there might be something wrong with our sales plan. After seven (7) days the enthusiasm to "get out there and sell" for these individuals will be gone. In addition, the related administrative costs and record keeping will be very expensive and will be burdensome to both parties.

The proposed rule also calls for the release of any information regarding prior civil or criminal litigation involving misrepresentation, or unfair or deceptive practices. Kitchen Fair sees little value in disclosing these lawsuits unless the judgment was adverse.

The proposed rule also requires direct sellers to gather information such as time periods, demographics, and earnings claims for its independent sales people. Kitchen Fair is concerned that this approach will be ineffective to prevent the targeted fraud because those perpetuating fraudulent business opportunities will not provide accurate data.

And last, the proposed rule requires the disclosure of a minimum of ten (10) prior purchasers nearest to the prospective purchaser. We are uncomfortable giving out the personal information of individuals, without their approval, to strangers because of the possibility of identity theft. Also, giving out this information without any controls on how it could be used will very likely benefit Kitchen Fair's competitors.

Kitchen Fair is opposed to this proposed rule because it has many unintended consequences that may destroy its business and because there are less burdensome alternatives available to achieve the FTC's consumer protection goals. Thank you for your time and consideration.

Sincerely, *A*

Gary R. Stephen
President

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