

June 13, 2006

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Federal Trade Commission
Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20508



RE: Opposition to Business Opportunity Rule, R511933

Dear Sir or Madam:

I am writing this letter as the administrator of Partners for Health and Home, LP a California Limited Partnership ("Company" hereunder) because I am concerned about the proposed Business Opportunity Rule R 511933 ("Rule" hereunder). I believe that in its present form, it could prevent Company from continuing its business as a Direct Selling Company. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for us to sell our products.

Opposition to the Seven-day Waiting Period

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new dealers. Company's sales kit costs only \$5.00. People buy TVs, cars, and other items that cost much more than that and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary, because Company already has maintained a buyback policy for all products including sales kits purchased by a salesperson since its inception of business. Under this waiting period requirement, all the dealers of Company will need to keep very detailed records when any dealer of Company first speak to someone about Company and will then have to send in many reports to Company headquarters.

Opposition to the Release of any Litigation Information

The Rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if Company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to us that Company would have to disclose these lawsuits unless it is found guilty. Otherwise Company is put at an unfair advantage even though Company has done nothing wrong.

Opposition to the Reference Requirement

Finally, the 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

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including those of competitors. In order to get the list of the 10 prior purchasers, a dealer of Company will need to send the address of the prospective purchaser to Company headquarters and then wait for the list. I also think the following sentence required by the 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 had been working for Company more than 10 years and now working as the administrator of Company. I like the products, made money, and enjoyed meeting people. Now I am taking care of hundreds of salespeople working with Company. Their families are depending on the extra income coming from direct selling to supplement their budgets

I also appreciate FTC's job to protect consumers, but I believe this proposed Rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments herein.

Best regards

Maria Han
Administrator
Partners for Health and Home, LP
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