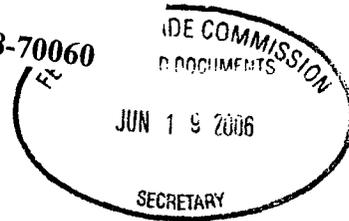


Jeff Sanborn
Shaklee Independent Distributor

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522418-70060



June 13, 2006

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

Re: Business Opportunity Rule, R511993

Dear FTC Official:

I am writing to express strong opposition to the proposed Business Opportunity Rule R511993.

I support the FTC in their efforts to crack down on "unfair and deceptive acts or practices." As an honest distributor, I am concerned when I hear of people who have been taken advantage of by my competitors.

I am very concerned with the requirement that I obtain and distribute personal information of distributors to strangers who state that they are contemplating becoming a distributor in my group. This is an open invitation for the "poaching" of our member lists by competing (dishonest) companies. The risk that a prospective member could have their identity stolen in this manner is enough to make it hard for me to recruit new member/customers, let alone active business-building distributors. My company has a very good record of keeping our personal information secure and they have never sold our information to anyone. This is a major factor in my ability to recruit new members and business builders.

I am concerned about my own burden, but I guess I can handle that. What really concerns me is that this is so extreme that it will make it horribly burdensome for someone just starting out in this business. Most people don't start in this business full-time; they dabble a bit and eventually decide to go full-time when they meet with some success. If a huge administrative burden is placed on them, most people will say, "Forget it, I don't need the headache."

I support the FTC's efforts to keep people from being ripped off. If such rules are to go into effect, it seems to make more sense to focus on "opportunities" that require a lot of up-front investment. Ours membership cost is only \$19.95; none of that fee is distributed to any other member. Shouldn't the burden be on companies charging at least \$100? I know of a dating-service marketing itself ostensibly through a multi-level marketing plan that charges \$500 for the opportunity, and most of that fee is distributed upline. To me, this is a pure pyramid scheme.

I know of another company in which the majority of income made by the most successful distributors is made on the purchase of sales aids and seminar tickets, not the products. I would love to see the FTC focus on that scheme. I have a friend who spent over \$5,000 on cassette tapes and videos before he dropped out. He was never told that his uplines were making money off of his tape purchases.

The current proposed regulations do not seem to get to the core of how to protect people from the dishonest companies or individual distributors. All they do is to put a destructive burden on all of us that ultimately will not protect the consumer.

Please rewrite the regulations to focus on the real problems facing our industry.

Thank you for considering my comments.

Sincerely,


Jeff Sanborn
Shaklee Independent Distributor