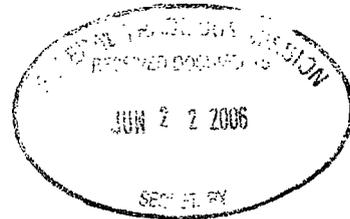


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June 10, 2006

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

Re: Business Opportunity Rule, R511993

Dear Sir or Madam:

I was shocked and dismayed to see what has been proposed in Business Opportunity Rule R511993. This would make it very difficult for me to operate my business as a Shaklee Independent Distributor, a business I started thirty years ago and which is now my sole income.

In my business, most people who have seen a presentation wish to buy products right away. They almost always wish to purchase a membership (\$19.95 for the New Member Kit) so that they can purchase at the Member Price. Why would you propose a seven day waiting period to sign an application? This will add confusion for the customer and an administrative burden for me as I attempt to keep track of everyone's date to be able to send in applications. I understand the FTC responsibility to protect consumers from deceptive practices, however a truly deceptive company could find a way around this anyway, and truly honest and upstanding companies, like Shaklee will suffer needlessly. All of our products carry either a money back guarantee or a warrantee and even the \$19.95 kit can be returned within two years of purchase.

Even worse is the proposed rule requiring the disclosure of a minimum of 10 prior purchasers nearest to the customer. What a breach of personal information! Before I purchase at the local drug store, do they need to divulge the personal information of at least 10 people who have purchased at their store? Or how many prescription errors there were? Or how many drug side effects occurred for those people taking the drugs? I think that prescription drugs taken as prescribed is among the top ten leading causes of death in our country yet there is no such burden on the doctors or the stores that prescribe drugs or sell them. That is just an example. Could any business function with such burdensome rules? How irate would customers be if their names were given out as 10 nearby customers of that store?

And what about the brand new Shaklee distributor? How do they ever sign anyone up? Until they sign up at least 10 members, they would not have 10 member/customers to divulge information on.. We also can sponsor members in the entire USA as well as several other countries. What if I sponsor someone in Nevada and they are the only person I have in the Western states because most of my group is out east? I give them ten names of people in Ohio or Michigan? Do I burden Shaklee to search these out for me? Do I spend my days compiling lists for new members?

This country was founded by hard working business people and people who had a dream of a better life. This country has also recognized the dangers of monopolies. Direct selling companies allow people who are willing to work hard to earn a living without depending on large corporations. Checking out individual companies if there seems to be a problem or having quality standards for products sold is reasonable for any company no matter the type of marketing if being done to protect the consumer.....not special interests.. However choking the life out of small businesses through burdensome administrative requirements is counterproductive for everyone.

Sincerely,
[REDACTED]

Nancy Underwood, Shaklee Key Coordinator

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