



**WESTERGAARD ASSOCIATES**  
ANN & JIM WESTERGAARD

June 2, 2006

522418-70232

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 Sir or Madam:

**I strongly oppose the proposed Business Opportunity Rule R511993.**

I have been a Shaklee Distributor for more than 34 years. Shaklee Corporation offers thousands of people the opportunity to have healthier, more productive lives regardless of education, financial status or age.

I believe this proposed new rule has many unintended consequences for direct sellers. I will address only one of the many parts that are objectionable:

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new distributors. Most of the people who sign an application do so to purchase Shaklee products at a wholesale price. In other words, they are solely consumers of the products. If they later wish to build a business, all they must do is supply Shaklee Corporation with their Social Security Number or Tax Identification Number.

There is no additional kit, fee or application required. The Shaklee Member Kit costs only \$19.95. This is far less than many consumer purchases, from TVs to all manner of household appliances, none of which require a seven-day waiting period.

In addition, the seven-day waiting period is unnecessary in that Shaklee Corporation already has a buyback policy for products, including the member kit, purchased by a distributor within the past two years.

Sincerely,

[Redacted Signature]  
Ann Westergaard

Cc: Congressman Howard Coble