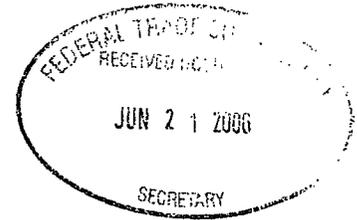


Norene Cragg
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522418-70342



June 10, 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 Sir or Madame:

This letter is regarding the proposed Business Opportunity Rule R511993. In its present form this could prevent me from continuing as an Avalla Consultant. I understand that the FTC's responsibilities are 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 for me to sell my products.

The seven day waiting period to enroll new Consultants is confusing. Avalla's sales kit only costs \$59 plus tax and shipping. I think this seven day waiting period is unnecessary because Avalla already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. This waiting period will require me to keep detailed records when I initially contact a person about Avalla and result in many reports to Avalla headquarters, subsequently increasing my cost of doing business.

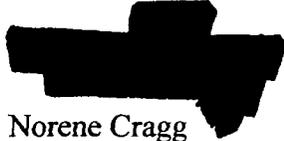
The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. This is regardless of the company being found innocent. People can sue for almost anything and it does not make sense to have to disclose even if the company is found innocent.

The requirement of the proposed rule to disclose a minimum of 10 prior purchasers within the purchasers region makes way for the possibility of identity theft and I would feel uncomfortable giving out my client's personal information without their consent. I would also have to send the address of the new client to Avalla and wait for the list, thus hampering my business. The following sentence required by the proposed 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 will be reluctant to share personal information with people they have never met.

When I initially signed with Avalla 12 years ago it was just for the good products and later I became a distributor to earn a little extra money. Now, I will be doing more to supplement my retirement.

The FTC is there to protect consumers, but I believe this proposed new rule has many unintended consequences and I feel there are less burdensome alternatives to reaching its goals.

Yours truly,



Norene Cragg