

Ellie Whiteman
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

522418-70607

June 2, 2006

Federal Trade Commission/Office of the Secretary,
Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580



RE: BUSINESS OPPORTUNITY RULE, R511993

As a small independent business owner, I am deeply concerned about the proposed business Opportunity Rule R511993. If adopted as written, it could inhibit my success as an independent Weekenders Sales Manager and possibly have a very negative impact on my career. Although I realize that the role of the FTC is to protect the public from "unfair and deceptive acts or practices", some of the sections in the proposed rule will make it almost impossible to continue selling and supporting Weekender products and my business.

In my previous career as an owner of a residential real estate franchise for 15 years it would have been unheard of to incorporate the most confusing and burdensome sections of the proposed rule ~ a 7 day waiting period to enroll new coordinators. Weekenders Sample Pak options range from \$150 to under \$500. It would cost my new real estate agents that or more to start the business (dues to join Multiple Listing Boards, licensing, desk fees etc). The public purchases items every day - computers, TV's, Ipods, refrigerators etc - that cost much more than that and they do not have to wait 7 days to do it.

Not only does this waiting period give the impression that there is something wrong but it is entirely unnecessary since Weekenders has a very generous return policy. The new salespeople have 12 months to return ALL products including sales kits at a 90% buyback. In my real estate business there was no reimbursement whatsoever for someone leaving the business.

Under this waiting period requirement, I would need to keep very detailed records when I first speak to someone about Weekenders and will then have to send in many reports to the home office.

Another concern of the proposed rule calls for the release of ANY information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. In this age of mounting litigation, anyone or any company can be sued for almost anything. Why would it be necessary to disclose any frivolous lawsuits unless it was a serious offense and Weekenders were found guilty. Weekenders and I are both put at an unfair advantage even though NO crime was committed.

If the above weren't burden enough, the proposed rule also requires the disclosure of 10 prior Fashion Coordinators nearest to the prospective new Coordinator. Giving out references is a good thing but I'm not comfortable giving out personal information to strangers without their prior approval. Every day we are warned more and more about identity theft and the ease at which the criminals can adversely affect our lives.

Also, many of the Coordinators could be involved with multiple independent businesses and this could be damaging to their business relationships. In order to get the list of the 10 prior Coordinators, I will need to send the address of the prospective Coordinator to Weekenders headquarters and then wait for the list. Again, that would have been unheard of in the real estate industry !

Because of our heightened awareness of identity fraud, the sentence required by the proposed rule: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." is going to prevent people from wanting to sign up as a salesperson. Why would I want my information going out to someone I don't even know?

After a very lucrative and personally rewarding career as a Real Estate Broker in Illinois ~ I still maintain my license ~, when I moved to Florida 9 years ago I reviewed my many options for a new business. After due deliberation and close examination of the Weekenders marketing plan, I felt and still do that it is the most rewarding and "safe" opportunity that I could have involved myself in. After becoming a Coordinator in 1998 and working my business for a couple of years, I moved into the role of Independent Sales Manager where I have been able to mentor many, many salespeople in their own business.

Weekenders has allowed me to have a financially rewarding business with exceptional personal growth while at the same time I have the flexibility and freedom of time to spend with my family and take care of my out of town aging parents. There are very few careers I could have had when I started again at the age of 50 that gave me all these benefits that Weekenders did.

Coming from a corporate background I fully appreciate the necessity of regulation and the work of the FTC to protect consumers, but I believe that this proposed new rule has many, many unintended consequences as written that would put a barrier up to the potential success of an individual and that there are alternatives that would be less burdensome and more realistic.

In conclusion, we are Americans and have the right and ability to dream big. We also have the freedom to make choices and decisions that are right for ourselves. I'm glad that Weekenders was available to me when I needed it and hope to be able to continue to offer it as an option to many others.

Thank you for you kind consideration of my comments.

Sincerely,


Ellie Whitman, Independent Sales Manager
Weekenders