

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

Dear Sir or Madam:

I am writing this letter because I am **concerned** about the proposed Business Opportunity Rule R511993. As it is presently written it would prevent me from continuing as an Associate for Isagenix International, headquartered in Arizona. This is **my only income** other than a small retirement payment.

I was in the banking industry for many years and achieved an executive position. However, when interstate banking became accepted, the bank that I had helped found, was merged with 1st Interstate out of California. What happened to me is typical – I was told I was “over qualified” for our area (Spokane WA.) offered a great job in Los Angeles, but as a single mother of two teenagers had to decline. I took my severance package and bought myself a travel agency – and by 1996 realized the business I had built was declining in value due to the power of the internet and personal computers.

I needed to add to my income – but, as a small business owner, had no additional time – and that’s when I was introduced to network marketing. I had a very skeptical view of the industry and to be honest, was doubtful it would work. Well it was life saving for me – the travel industry continued to decline but I was able to merge my agency with another and recoup about 20% of its value. I then turned my attention and efforts to the NWM industry and have never regretted it. I have been an Associate with USANA Health Sciences for 10 years and about a year ago affiliated with Isagenix.

Some of the sections in the proposed rule would certainly make it difficult or *almost impossible* for me to sell my Isagenix products. The proposed **waiting period** will give the public the idea that there’s something wrong with me or our plan and would also reflect badly on me. I also think this seven-day waiting period is unnecessary, because Isagenix has a **full refund policy for first time buyers**. This is a normal practice for most all of the companies. At least the legitimate ones!

One of the most difficult sections of the proposed rule is the seven day waiting period to enroll a new Associate. You know as well as I do that if you were required to wait seven days before completing a purchase of anything – you probably wouldn’t consummate 90% of those purchases. Think of the last car you bought or television and apply the rational you are proposing in this rule – it doesn’t make sense. I guess to compare what you are proposing though you

would need to think of the last time you bought groceries – since the amount we are talking about doesn't come near to what buying a new television or car would cost!

And then let's talk about the burden all this **record keeping** will add. As I understand it I will need to keep very detailed records when I first speak to someone and will then have to send in reports to my company. I am a small home business, how would you propose this be accomplished – do you see how this could be a turn off to someone considering building a networking business – we don't have enough time now – how can you expect a **working mother/housewife** keep up with this requirement? **Your proposal doesn't make sense it is poorly thought out – it is a bad rule!**

Think about this – there is only a three (3) day waiting period for buying a gun!

Finally, the proposed rule requires the disclosure of a minimum of **10 prior purchasers nearest to the prospective purchaser**. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (with or without their approval) to strangers. The women I have talked with are especially concerned – they feel it could subject them to sexual or racial harassment so this part can't go in at all. I've seen in some communication that if the FTC passes an addition to this rule prohibiting sexual or racial attacks related to this disclosure – that would correct this flaw. Come on – sexual and racial harassment are already illegal and yet it still occurs. **Passing a law against something doesn't stop that particular thing from occurring – laws don't deter criminals** – they give the majority of us a rule book to play by – but we wouldn't have broken the laws anyway. I learned in banking that we couldn't stop a bank robber from robbing a bank – but we could make it as difficult as possible – leaving the robber to pick an easier target.

If for some bureaucratic reason this ruling is passed the burden you will place on the Companies as well as the Associates will be disastrous – you will be **negatively impacting hundreds of thousands, if not millions of households** who depend on the income their small business provides to make their house payment, to buy a second car, to help put their children through college – you need to understand the impact to the good guys before you propose a rule directed at the bad guys. Like in banking – we couldn't prevent robberies but we sure could make it more difficult – the same applies here. **You already have rules and laws – why not enforce them?** That would be a start – when you have that under control then see if a rule like this is needed. If you need any help learning of the scammers and the people breaking the law – just ask – and just think, when you do start enforcing the present "rules" – it will be a true "win-win" – you'd be accomplishing what you seem to only be giving lip service to now.

This ruling is unnecessary, poorly thought out and, in my opinion, your way of saying "we're doing something about the problem". **Enforce the rules you presently have on the books before adding more.**

Sincerely,

[REDACTED]

Cecily Wright

[REDACTED]