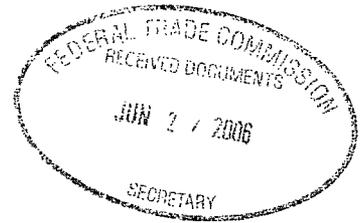


Julie Mitchell  
Independent Diamond Designer  
Home & Garden Party



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June 22, 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

Dear Sir or Madam,

I am writing to express my concern about the proposed Business Opportunity Rule R511993. I truly believe that in its present form, it will prevent me from continuing as a successful Independent Designer with Home & Garden Party. I understand and respect that the FTC has responsibilities to protect the public, yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Home & Garden Party products.

I have been in the direct selling profession for more than 6 years. Originally, I became a Designer because I had a bill hanging over my head and it was a wonderful opportunity to pay that off as well as work around my full-time job and my family schedule. Now, that bill has been paid off for awhile, I have earned free travel and have shared this wonderful profession with others who are able to do the same thing—work at home and enjoy life!

This is where I believe the proposed rule will affect me, personally, the most. In the proposed rule there is a seven-day waiting period to enroll new Designers. Home & Garden Party's starter kits are either \$99 or \$149 and usually within seven days the new Designer could have already received that kit and be earning money! This waiting period gives the impression that there might be something wrong with Home & Garden Party and/or our compensation plan. Also, under this waiting period requirement, I must keep very detailed records when I first speak to someone about Home & Garden Party and will then need to send in many reports to my company headquarters. As a leader with Home & Garden Party I believe this will hinder most of the Designers I know (including my own team) from even sharing our wonderful opportunity because of the paperwork!

There are a few other sections of the proposed rule that will negatively impact not only my business, but many others in the direct selling profession. I am thinking especially of the requirement of disclosing a minimum of 10 prior purchasers nearest to the prospective purchaser. I would certainly be happy to provide references, but I'm not

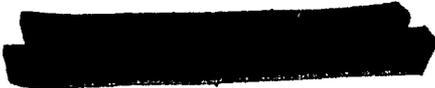
June 22, 2006

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comfortable at all giving out personal information to strangers. This would also require a lot of paperwork and research on my part, not to mention that giving this personal information could damage my business relationship with the people who may be involved with other companies or business, including those of competitors. This will also create an unnecessary waiting period resulting from my having to send the address of the prospective purchaser to Home & Garden Party headquarters and then waiting for the list. I also think this also opens up a whole new issue with identity theft and people will be less willing to sign up as a Designer if they know their personal information will be available to people they have never met.

I appreciate your time and effort in your work to protect consumers, yet I believe that this proposed new rule has many consequences for the direct selling profession. I would urge you to seek less burdensome alternatives to achieve your goal.

Sincerely,

  
Julie Mitchell

cc: Home & Garden Party Home Office  
  
