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Amy Czuba  
Stampin' Up! Independent Demonstrator, Executive

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July 11, 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, R51

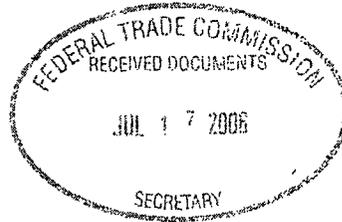
Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Stampin' Up! demonstrator. I understand that part of the FTC's responsibility is 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, if not impossible, for me to sell Stampin' Up! products. After reading the summaries, I am concerned that you truly do not understand how legitimate and ethical direct sales companies, such as Stampin' Up!, and the demonstrators associated with Stampin' Up!, conduct business.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new demonstrators. This waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary, because Stampin' Up! already has a policy under which they will repurchase all products, including sales kits, at 90 percent of their cost, for up to a year. There truly is a no-risk obligation when someone joins Stampin' Up! A person can buy the starter just to receive a discount on the items in the starter kit and they are never obligated to place another order with the company. Why would someone need 7 days to "consider the risk" involved? There is no risk! Under this waiting period requirement, I would need to keep very detailed records when I first speak to someone about becoming a demonstrator for Stampin' Up! and then will have to send in many reports to Stampin' Up! headquarters. As a small independent seller, more reports and trying to be compliant with a complex set of rules just makes it that much harder to do business. Why would you want to implement a program that would make it difficult for independent demonstrator to succeed? Why is it that people can buy TVs, cars, and other items that cost much more than the mere \$199 for a Stampin' Up! starter kit, yet they do not have to wait seven days to reconsider their decision.

The proposed rule also 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 day and age, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Stampin' Up! is found guilty of something. Otherwise, Stampin' Up! and I are put at an unfair advantage even though we have done **nothing** wrong. Again, this makes it appear that direct selling companies are unethical or devious, leading to lawsuits more so than any other type of person, company or enterprise, when in fact I'm sure that's not true.

I teach people to create  
hand stamped stationary  
through my  
direct sales  
business!



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 (without their approval) to strangers. In order to get the list of the 10 prior purchasers, I would need to send the address of the prospective purchaser to Stampin' Up! headquarters and then wait for the list. I also think 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 identity theft, and about being targets of aggressive marketers. They will be reluctant to share their personal information with individuals they may have never met. Also, it could easily allow people who are competitors to steal confidential downline information, or enable others to market products or services to them on the basis of their being connected with direct selling, without their having requested such communications. Without any intention to offend someone, whoever wrote this proposed rule clearly does not understand the business of direct selling.

I have been a demonstrator for Stampin' Up! for more than 3 years. Originally, I became a demonstrator because I like stamping and wanted to earn some additional money. Now my family depends on this extra income to supplement our budget. I have achieved incredible success with this company, and believe me, had these rules been in place 3 years ago, I would have never joined. I have personally recruited 38 people in that time, 32 of which are active demonstrators. I have a total of 157 demonstrators in my 5 levels of downline, and I provide training, inspiration and leadership to all of them. I have personally developed self esteem, confidence and leadership skills through my opportunity with Stampin' Up! The income I make from my Stampin' Up! job provides for my family. Its flexibility allows me to spend time with my 3 kids, to volunteer at their school, and schedule around their many activities. There are not many jobs or business opportunities available that allow a person to set their own hours and make a significant income for their family.

However, I would like to point out that a great many demonstrators do not join strictly for the business opportunity. Many join simply because they love stamping, they are looking for a creative outlet, a fellowship of other women (and a few men!) and they are looking for a way to make a difference in the lives of others. Most are really not thinking about making this a career. Some people join to get the personal discount that demonstrators receive, and to share stamping with their family and a few friends. Many are only thinking about making a little part time money. But some people join because they see the amazing business opportunity right off the bat. Many of us are "stay-at-home" moms, many of us have other part-time jobs, and quite a few of us have a full-time career outside of Stampin' Up! I certainly don't make any claims about income earnings when I talk to people about joining, but I do talk about many of the benefits Stampin' Up! has to offer everyone, no matter what their level of involvement is.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals. The FTC may understand many of the problems and abuses that may exist from time to time in the industry, as in many other industries, but it has clearly not gone to the effort to understand how our small independent direct selling businesses really work, and especially to understand how fragile they are. A complicated federal law, with a whole new set of legal requirements, may make it impossible for many of us to continue. I personally do not feel I would be able to build a business if you implement these changes, and I certainly don't want my company wasting time and resources to provide me with these ridiculous reports and documentation that would be required of me. If these rules are implemented, you will be harming the business

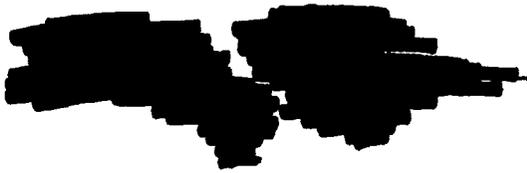
opportunity of everyone, in fact I think the result you would see would be the exact opposite of what you want to accomplish.

I would encourage you to call me, or better yet, to visit me in Massachusetts, shadow me, see how I run my business, so you could see first hand how these changes would negatively impact my business. Outside of my Stampin' Up! "job", I am a stay-at-home mom with 3 busy children and I am truly the face of a direct selling company.

Thank you for your time in considering my comments.

Sincerely,

Amy Czuba

A large, irregular black redaction mark covering the signature area of the letter.