



THE POWER TO TRANSFORM LIVES

**Mark Funaki**  
Vice President and General Counsel

May 16, 2008

Federal Trade Commission  
Office of the Secretary, Donald S. Clark  
Room H-135 (Annex S)  
600 Pennsylvania Ave, NW  
Washington, DC 20580

**Re: Business Opportunity Rule R511993**

Dear Mr. Clark:

I am writing on behalf of JAFRA COSMETICS INTERNATIONAL, INC. ("JAFRA") to let you know that JAFRA appreciates the FTC's good faith efforts to consider the views of thousands of direct sellers. JAFRA concurs with the FTC's conclusion that revisions to the originally proposed rule were necessary to exempt legitimate direct sellers from coverage.

As a direct selling company and member of the Direct Selling Association, we recognize and support the FTC's important consumer protection role and share the commitment to protecting the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as our own and we fully concur with the comments and suggestions submitted to the FTC by the Direct Selling Association. We trust that these helpful recommendations will be incorporated as the FTC works to perfect, clarify, and implement the improved and revised business opportunity rule.

Sincerely,

Mark Funaki

cc: John W. Webb, Direct Selling Association  
Frank Mineo, JAFRA Cosmetics International, Inc.

JAFRA COSMETICS INTERNATIONAL, INC.  
2451 Townsgate Road  
Westlake Village, CA 91361

Phone 805 449 3061  
mark\_funaki@jafra.com  
Fax 805 449 3256

[www.JAFRA.com](http://www.JAFRA.com)