

Susan Massucci
Independent Instructor #US3640
Leaving Prints

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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 Leaving Prints Instructor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Leaving Prints products.

I have been an Instructor with Leaving Prints for more almost 2 years – 22 months to more precise. I initially joined Leaving Prints because I really love their products and thought I might be able to hold a few parties to support my hobby. Since joining, I recognized the incredible opportunity available to me and I have been able to build a thriving business. I also realized that this was a way I could stay at home with my 2 children and still earn an income. I truly believe that being home to raise my children with good moral values is important. I don't think a day care provider could do as well, if I had to work outside my home.

While my husband and I made the decision for me to quit my full time job to stay at home with my children, it did create a financial burden on our family. Leaving Prints is helping to fulfill that financial gap. I also have gained self-confidence that I can be a successful businesswoman as well as a competent mother. Only in direct sales, could I achieve these kinds of results, with such a flexible schedule to accommodate my kids. I also feel that if something were to ever happen to my husband, I would have the necessary job skills to either increase my business efforts or even go back into the work force if I had to.

I have also seen many other instructors who are full time moms, blossom into wonderful saleswomen as well. Discovering success is rewarding in so many ways – both financially and emotionally!

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new instructors. The Leaving Prints sales kit only costs \$30. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because Leaving Prints already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months.

Leaving Prints is also a member of the DSA (Direct Sellers Association) a third party organization that requires a screening process to be associated with them. We

already adhere to strict code of business ethics, which makes Leaving Prints a good organization to buy from and/or work for.

Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Leaving Prints and will then need to send in many reports to my company headquarters. While I am very organized, this will add an unnecessary burden to me. First of all, it sounds very time-consuming. I already have a limited number of hours to spend on my business and this will take more time away from me. I also feel that it will add more costs to my business for filing and storage. This, I can just imagine, will add more operating costs to the corporate offices as well. And as we all know, time is money, therefore a loss of time available to do business directly relates to a loss of business sales and financial gain.

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. Today, 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 Leaving Prints is found guilty. Otherwise, Leaving Prints and I are put at an unfair advantage even though Leaving Prints has done **nothing** wrong.

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. Also, while I have a team of over 200 instructors, this is still not enough nationwide to have 10 instructors who are all in proximity of each other. I can't imagine what a difficult task this would be for a new instructor who has just gotten started and not yet built a team. The challenge would be immense.

In regards to identity theft, I know of several people who have been victims. I know they would be very unwilling and unreceptive to providing their name and information as a reference. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Leaving Prints 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. They will be reluctant to share their personal information with individuals they may have never met.

Furthermore, I am not sure I would want to be involved with a business that has to adhere to this kind of policy either. I want to protect my own privacy rights. As I mentioned before, I have a team of over 200 instructors. If I were to quit Leaving Prints due to this policy change, I would leave 200 other peoples businesses in a lurch! That is unacceptable to me.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

It is the American way to be able to build a business of your own. Direct Sales companies allow this dream to come to fruition without the major startup costs that are typically associated with starting a new venture. This new proposed law would put my business, as well as MANY others, in tremendous jeopardy and not allow us to do our businesses with ease.

Please reconsider what you are proposing. Thank you for your time in considering my comments.

Respectfully,

Susan Massucci
Leaving Prints Independent Instructor
Team Captain