

Paula Miller
Independent PartyLite Consultant

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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 continued success as an Independent PartyLite Consultant. 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 share the PartyLite business opportunity with others.

I have been an Independent Consultant with PartyLite for over a year, and I look forward to many more. I began my PartyLite business so I could stay home and raise my two children after being laid off from my computer-programming job. It was a spur of the moment decision I have never regretted! PartyLite has a great deal of integrity, which is something I am proud of. I am thrilled that I have been able to share this business opportunity with other women, enabling them to stay home with their children, work on paying off debt, contribute to their family income, and give them financial independence and freedom.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new consultants. PartyLite has a fabulous program and GIVES their sales kits AWAY! There is absolutely no investment or risk involved and NO reason to wait 7 days to begin the business. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. And it would hinder others in starting their business in the time frame they choose. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about PartyLite and will then need to send in many reports to my company headquarters. I want to continue to easily introduce PartyLite to more people who could benefit as I have. The regulations you are proposing would hinder me from doing so – and would hinder others in starting their business in the time frame they choose.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. It would be impossible for me to provide these potential consultants with the names of 10 consultants closest to them geographically, because I don't personally know all the consultants in those areas. Since we all are independent business people, we don't have the means to contact or keep lists of all the other PartyLite consultants who may be doing business in any particular region. Further, even if I had that contact information, I would not feel comfortable providing the personal contact information of other consultants I don't know to someone who is considering joining PartyLite. Nor would I want my own personal information given out freely by consultants who don't know me, to people I don't know. 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. 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.

I have to assume that there are other multi-level marketing companies and consultants out there who are operating without the ethics that I have seen demonstrated consistently throughout PartyLite. I would hope that the FTC could tailor its remedies in a manner that is designed to address those issues or those companies without adversely affecting PartyLite and other reputable direct-selling companies and their consultants. I'm grateful that we have the FTC working to protect average consumers like me, but in this case, you will be working *against* me, impacting my income, my future and my family's future. I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Please reconsider the regulations you are proposing.

Respectfully,

Paula J. Miller
Independent PartyLite Consultant