

**Federal Trade Commission
Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993**

Judi Gephart
The Essential Hart

July 15, 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

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Dear Sir or Madam:

I have dedicated much time and energy to building my Young Living Essential Oil (YLEO) business since I began it in 1996. This business is my main source of income and I am greatly dependent these earnings. However, I am now concerned that the FTC's proposed Business Opportunity Rule (R511993) as presently drafted could greatly hinder or even ruin my business. This rule proposes certain unnecessary and burdensome requirements that will make it very difficult if not impossible for me to sell Young Living Essential Oil products.

The proposed seven-day waiting period to enroll new independent YLEO Associates is extremely burdensome and confusing. YLEO starting kit (Success Kit) only costs \$49.95. When people buy other items (cars, RV's, TV's, etc) costing much more than that they do not have to wait 7 days. This unfairly indicates that Young Living Essential Oils has something wrong with it's business plan or the company is questionable. My experience with Young Living Essential Oils the last ten years is that it is a company that conducts business with unwavering high ethics and integrity. If this rule passes as written I will need to keep very detailed records of when I first speak to a person about YLEO and will then have to send in many reports to YLEO headquarters. This would be extremely time consuming and burdensome.

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 any reason. It does not make sense to me that I would have to disclose these lawsuits, unless YLEO is found guilty. Otherwise, YLEO and my YLEO business are put at an unfair advantage because potential independent YLEO Associates are misled to believe that YLEO is guilty of wrong-doing even though YLEO may have done anything wrong.

Finally, the proposed rule requires the company to disclose to each prospective

independent YLEO Associate the names and contact information of a minimum of 10 previously enrolled independent YLEO Associates who live nearest to the prospective Associate. 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, sharing this type of information with business prospects who may be involved in other network marketing businesses creates an opportunity for those prospects to recruit enrolled YLEO Associates away from the YLEO opportunity. YLEO considers the names of its independent Associates to be confidential and trade secret information, and a requirement to disclose this information for this purpose makes it very difficult for YLEO to protect its trade secret information and this could damage the company's business. Moreover, in order to get the list of the 10 previously enrolled independent Associates, I will need to send the address of the prospective Associate to YLEO headquarters and then wait for the list. This will make recruiting prospects for the YLEO opportunity a very slow and tedious process. I also think the following sentence required by the proposed Rule will prevent many people from wanting to sign up as an independent YLEO Associate, "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 the privacy of their personal information and the potential for identity theft. They will be reluctant to share their personal information with individuals they may have never met.

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.

Thank you for your time in considering my comments.

Sincerely,

Judith A. Gephart