

522418-70334



Federal Trade Commission  
Office of the Secretary - Room H-135 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

June 19, 2006

RE: Business Opportunity Rule, R511993

To Whom It May Concern:

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 distributor with a company that I love, Athena's Home Novelties, Inc. I have worked with many different direct selling companies over the years, and have been with Athena's for two years.

One could start their own Athena's business with as little as a \$250 investment. I have been an Athena's distributor for a little over two years now. This proved even more important to me last year when I lost my husband to cancer. This business allowed me the time to grieve his loss, and be there for my children, as well as have enough income to pay all my bills including my mortgage. My future income and my son's college education now depend solely on the direct selling business – and more specifically with Athena's Home Novelties.

I understand that part of the FTC's responsibility 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 our products. The record keeping that is proposed is a nightmare in itself!

In addition to the detailed record keeping, the most confusing and burdensome proposed rule of the seven-day waiting period to enroll new distributors. Athena's sales kits start as low as \$250.00. This waiting period gives the impression that there might be something wrong with our company or the compensation plan. Many distributors that leave their company don't have the same "drive" to succeed as the ones that remain, giving an unbalanced perception of the opportunity.

The additional time and paper required would put an unnecessary burden on many of these small direct selling companies and their distributors, forcing many people to just give up or worse be forced out of business. I am certain that this is not the intention, however it would be the result.

Finally, the proposed rule *requires* the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. **I have two huge concerns with this:**

The first is **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.

The second concern is **confidentiality** - which is the biggest concern to our customers. Many don't want to even enter or be seen in an adult novelty shop; therefore they attend a party with their friends, under the condition of anonymity, as to who attended and what they purchased. Providing this information would damage the business relationship of my customers, as well as any future business or referrals. In addition, in order to get the list of the 10 prior purchasers, I will need to send the addresses of the prospective purchaser to Athena's Home Novelties headquarters and then wait for the updated list.

As a former Amway distributor; I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences. There are less burdensome alternatives available to achieving your goals, please take the time to read the letters from concerned direct selling distributors, and understand the impact that these rulings will have on us.

Thank you for your consideration.

Sincerely,

[REDACTED]

Karen Meara  
Athena's by KAREN

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