



June 14, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Ave. NW
Washington, DC 20580
Re: Business Opportunity Rule, R511993

Dear Representative Campbell,

I'm concerned about the proposed Business Opportunity Rule R511993 and believe that in its present form it could prevent me from continuing as a Consultant in my profession. Part of the FTC's responsibilities are to protect the public from "unfair and deceptive acts or practices," and some of the sections in the proposed rule will make it impossible for me to provide my clients with nutritional products.

The seven day waiting period to enroll new people is most confusing and burdensome. People buy many items from retail vendors and do not have to wait seven days. This waiting period gives the impression that there may be something wrong with the plan. As I understand it, the seven day waiting period is unnecessary because direct selling companies already have a 90% buyback policy for all products purchased within the last twelve months. The proposed plan will create an abundance of paperwork for me - when I first consult with people, I will have to keep detailed records, then other records when I follow up with them - thus compounding the Company that supplies my clients with their products overwhelming paperwork.

The proposed rule requires the release of information regarding lawsuits of unfair or deceptive practices, but does not state whether the company is guilty or not. This puts me and the company at an unfair advantage even though the direct selling company has done NOTHING wrong. I conduct my business in an honest and forth write manner, and have no intention in misrepresenting the company or my integrity.

While I am willing to provide references, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser, I am uncomfortable giving out the personal information of my clients without their approval to strangers. Giving away this information could damage the business relationship of the references who may be involved in other companies. Under this current proposal, I would need to send the address of the prospective purchaser to direct selling company headquarters and then wait for the list to be 'approved', thus causing my client to wait unnecessarily for the benefits of the program I have designed for them at the consultation meeting. People are very concerned about their privacy and identity theft, and this proposed rule would expose people's right to privacy.

I have been a Certified Nutrition Consultant and Wellness Consultant for more than 10 years. My purpose for serving in this profession is to help people to improve their health and lifestyle, and to provide additional income to supplement my budget. My mission is to educate and inform people about the most recent scientifically based research that will work with the bodies God-given ability to rebuild.

The work of the FTC to protect consumers is appreciated, and I believe this proposed new rule has many unintended consequences. There are less burdensome alternatives available in reaching its goals...it is your challenge and duty to make sure all of these issues are addressed in the most efficient and concise manner. Thank you for considering my comments.

Sincerely,

A thick, black, horizontal redaction bar covering the signature of the sender.

Roberta Thomas, Certified Nutrition and Wellness Consultant

A thick, black, irregular redaction bar covering contact information, likely a phone number and email address.