



C.J. LaBracke, Chief Executive Officer  
John C. LaBracke, President  
June 22, 2006



522418-70581

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

To Whom It May Concern,

Today I am writing this letter to oppose the proposed Business Opportunity Rule R511993. I am President of Lifetime Cookware Associates in Waukesha, Wisconsin and have been involved directly in the business for 16 years. Indirectly, I have been around this particular direct selling business my entire life as my Dad has been involved for the last 50 years.

I do understand that it is the FTC's responsibility to protect the public from "unfair and deceptive acts or practices", but some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Lifetime Cookware and most importantly, to grow our business.

The proposed seven day waiting period to enroll new dealers will hurt our growth. Someone who is excited about getting started, if given the extra time to do so, will start doubting and wondering about the legitimacy of the business. Also, keeping track of when a person was first told about the business will require very detailed record keeping and will prevent us from growing our business.

The rule proposed also calls for the release of any information regarding lawsuits involving misrepresentation or unfair or deceptive practices. Apparently it does not matter if the company was found innocent. It makes no sense to me to disclose lawsuits in which Lifetime Cookware Associates was found innocent especially in today's society where a company can be sued for almost anything.

Finally, the rule proposed requires disclosure of at least 10 prior purchasers nearest to the prospective purchaser. Although I can provide references, in this day of identity theft, this raises serious privacy issues, not to mention volumes of paperwork and lost productivity.

I understand and appreciate the work the FTC does to protect consumers, but I believe the proposed new rule has numerous unintended consequences that will negatively impact millions of us who are in the direct selling business.

Thank you for your time and consideration.

Sincerely,

John LaBracke, President  
Lifetime Cookware Associates