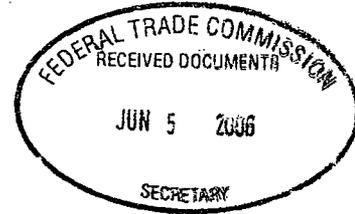


Francoise T. Greenwalt
Independent Herbalife International Distributor



████████████████████
████████████████████
████████████████████

May 22, 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

RE: Business Opportunity Rule, R511993

Dear Sir/Madam,

I am writing in response to the proposed New Business Opportunity Rule R511993, if not modified, it will be a significant impediment and burden to the network marketing industry. This new rule, although well-intended, represents a significant burden to the free market trade.

The proposed rule would require a de facto seven day waiting period to enroll new distributors. In essence, one would have to sell a person twice on the same business—even if the start-up fee is a mere \$19.95. While I support some of the disclosures with modification, I am opposed to a seven-day waiting period because it is excessive burden to any company and distributor who would be required to document and follow-up on the process and an impediment to new business development.

The rule requires that any earnings claim statement made by the distributor or company to a prospect, whether written or oral, general or specific, be validated with a detailed "Earnings Claims Statement Required by Law." Additionally, the distributor would be required to provide written substantiation of any earnings claim made upon request. I support the disclosure of an average earnings income statement because it is good business practices to establish realistic expectations. However, I oppose being forced to provide written substantiation because it is an excessive burden considering the investment of money to enter into the business is nominal.

The rule also calls for the release of any information regarding prior litigation and civil or criminal legal actions involving misrepresentation, or unfair or deceptive practices, even if you were found innocent. In our lawsuit-happy culture, anyone can be sued for anything almost with impunity. Irregardless of the outcome, you would have to disclose it and explain it to a new business associate which is patently unfair. I would only support the disclosure of previous litigation of companies, executives, affiliated companies and the like involving fraud and misrepresentation *only if the party is found guilty*. If the defendant is found not guilty, the opposing parties agreed to settle without admission of guilt or the case is still pending, then it should not be necessary to disclose this information. If the parties agreed to settle without admission of guilt, there usually is some public document available, particularly if it involves a government agency and further disclosure therefore would be unnecessary. If a case is pending case, it shouldn't be commented upon.

Lastly, the rule *requires* the disclosure of a minimum of 10 purchasers closest to you. While it is a good practice to provide references of satisfied customers, this is a burden for small businesses and, as a requirement, is a violation of personal confidentiality. Unfortunately, requiring the release of this information can threaten the business relationship of the references who may be involved in other companies or businesses. In addition, it subjects these references to cross-marketing by competitors. I am recommending that contact information for purchasers be available upon request, that their availability be published on company materials, and that due to Internet-marketing, they not be limited to geographic proximity.

The network marketing industry is one of the few remaining opportunities for people to leverage their time and limited resources to earn additional income or to create a new career. Once scoffed at by investors, many network marketing companies are publicly traded on Wall Street including Herbalife, Nu Skin, Pre-Paid Legal Services, USANA and others. Network marketing is being used by blue-chip corporations including Citigroup, MCI and IBM. Top business management leaders and *New York Times* best-selling authors Robert Kiyosaki, Paul Zane Pilsner, and Steve Covey have endorsed network marketing.

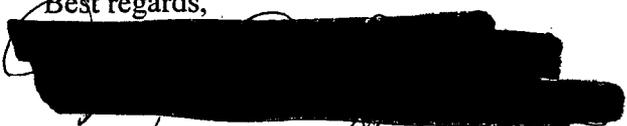
The industry is also growing in popularity and contributes to the US economy. This growth should be encouraged. There are 13 million Americans involved in this network marketing industry today. Lastly, the network marketing industry contributes to our growing economy. Sales of products and services through network marketing are estimated at more than \$29 billion in 2003.

I have been involved in the network marketing industry for more than 4 years. I have met some of the finest people and have been introduced to some of the best products. For the first year, I was involved because I wanted the benefit of using the products. Later, I decided to get involved on a full time basis. This home based business helped me significantly, and allowed me to spend more time with my family while earning additional income.

I understand and value the role of the FTC mission "to stand up for America's free market process and for its consumers, who benefit from competitive markets in which truthful information flows." However, I believe this proposed new rule exceeds what is necessary and needs significant modification. We live in a free market economy where people have the responsibility of making informed decisions based on best information. A better approach would be to provide consumers with objective criteria when analyzing a business opportunity and let an informed market proceed. I am in support of the disclosures should be made during the sales process without the requirement of a seven-day waiting period, only if modified as suggested.

Thank you, in advance, for reviewing and posting my comments.

Best regards,


Francoise T. Greenwalt

DOCUMENT PROCESSING

06 JUN -5 PM 12:42

FEDERAL TRADE COMMISSION

Additional commenters who submitted this form letter:

First Name	Last Name	Organization Name
Claudia	Abbott	Individual Business Owner
Willard	Abbott	Individual Business Owner
Terry	Apger	Individual Business Owner
Adam	Armstrong	Sageant, LLC
Gaylon	Avery	Individual Business Owner
Gaylon	Avery	Individual Business Owner
Barbara	Ballas	Individual Business Owner
Eric	Barajas	Individual Business Owner
Dennis	Barnes	USANA Health Sciences
Jeffrey	Barr	Global Mentors Group
Chic	Beck	Individual Business Owner
Anna M.	Bell	Individual Business Owner
Susan M.	Bender	Individual Business Owner
Susan M.	Bender	Individual Business Owner
Donna	Benhart	Pre-Paid Legal Services, Inc.
LuAnn	Benson	Individual Business Owner
Yvonne	Berlardo	Arbonne International
Ed	Bernstein	Individual Business Owner
Lonnie	Billops	Individual Business Owner
Dianne	Bradbury	Individual Business Owner
Becky	Braud	Individual Business Owner
Thomas T.	Brown	Individual Business Owner
Dee	Bruck	Individual Business Owner
Carol	Campa	Individual Business Owner
David	Carawan	Individual Business Owner
Barbara	Carawan	Individual Business Owner
Shane	Carpenter	Safer Living
Maurrin	Carter	Individual Business Owner
Anita	Castle	Individual Business Owner
Corelle	Chamberlain	Individual Business Owner
Glenn	Chamberlin	Bozeman Entertainment
Joe	Clark	Individual Business Owner
Linda	Clifton	Shaklee
Renee	Collins	Individual Business Owner
Anita P.	Conway	Photomax Executive
Richard	Cooper	Individual Business Owner
Kevin W.	Cooper	Individual Business Owner
Jeffrey M.	Cox	Individual Business Owner
Jeffrey M.	Cox	Individual Business Owner

First Name	Last Name	Organization Name
Robin A.	Cramp	Individual Business Owner
Ed	Dassie	Herbalife International
Robert	Dassinger	Individual Business Owner
Walter	Davis	Individual Business Owner
Kathleen	Dedon	Individual Business Owner
Walt	Dennig	Individual Business Owner
Walt	Dennig	Individual Business Owner
Russell N.	DeVan	Success by Design, Inc.
MaryEllen	Dietz-Holmes	Sageant, LLC
Cheryl	Drew	Individual Business Owner
Charlene	Earl	Individual Business Owner
Charlene	Earl	Individual Business Owner
Agaja O.	Enahoro	Individual Business Owner
Daren	Falter	Individual Business Owner
Noelle	Flasher	Max Your Mileage
Elizabeth	Foo	Individual Business Owner
Joan	Franklin	Individual Business Owner
Bill	Froehlich	Individual Business Owner
Mary C.	Fuller	Pre-Paid Legal Services, Inc.
Rusty	Gackle	Individual Business Owner
Shirley	Gaisford	Individual Business Owner
Shirley	Gaisford	Individual Business Owner
Kelly	Gaisford	Sageant, LLC
Dennis	Gillen	D&J Clean Air, Inc.
Timothy	Glennon	Individual Business Owner
Zahava	Goldman	Individual Business Owner
Ralph	Gora	Individual Business Owner
Eric K.	Graham	NuSkin Enterprises
Philip	Gray	FFI/Fuel Freedom
Sandy	Grear	FFI/Fuel Freedom
Nina K.	Green	Individual Business Owner
Francoise T.	Greenwalt	Herbalife International
Scot	Haig	Individual Business Owner
Tracey	Hall	Individual Business Owner
Mark	Hannig	USANA Health Sciences
Matt	Harris	Sageant, LLC
David	Hasz	Miracle Health
David	Hasz	Miracle Health
Bernice	Havard	Photomax
Suzy	Hayden	Individual Business Owner

First Name	Last Name	Organization Name
Michele	Hayes	Individual Business Owner
Haley H.	Haynes	Individual Business Owner
Haley H.	Haynes	Individual Business Owner
Karyl	Hermiston	Individual Business Owner
Dayrl	Hern	Longevity Consultants
Loralyn	Horning	Peerless Wellness
Jason	Hover	Individual Business Owner
Gary	Huerta	FFI/Fuel Freedom
Wade	Jackson	Individual Business Owner
Teresa	Johannessen	Individual Business Owner
Gary	Johnson	Individual Business Owner
Ed	Johnson	Pre-Paid Legal Services, Inc.
Cliff	Johnston	Individual Business Owner
Allen C.	Jones	Essex Capital Partners, LLC
Allen C.	Jones	Individual Business Owner
Elizabeth	Jones	Individual Business Owner
Pandasala	Kemp	Individual Business Owner
Danielle	Koprowski	Individual Business Owner
Henry	Kriegel	Individual Business Owner
Rita	Kuku	Arbonne International
Gloria	LaBarge	Individual Business Owner
Jonathan D.	Lane	Individual Business Owner
Mark	Langston	Individual Business Owner
Angela	Ledbetter	Individual Business Owner
Jonathan	Limpert	Individual Business Owner
Chris	Lopez	Individual Business Owner
Chris	Lopez	Individual Business Owner
Robert	Lynn	Individual Business Owner
Junicris	Mamuad	Individual Business Owner
James E.	Manson	Xango Distributor
Matt	Martincich	Montana Harvest Natural Foods
Sharon	Mathews	Individual Business Owner
Gary	Mathis	Imagine Longevity
Gary	Mathis	Individual Business Owner
Yoko	Matsushita	Arbonne International
Jack	Mattson	Individual Business Owner
Allen A.	Maxwell	Individual Business Owner
Marissa	McBean	Individual Business Owner
Cindy	McCarthy	Individual Business Owner
Alexis	McCarthy	One of a Kind Bud Productions

First Name	Last Name	Organization Name
Brian	McCormack	Arbonne International
JoAnne	McCormack	Arbonne International
Ronald	McCoy	Individual Business Owner
Renea	Mears	Arbonne International
Robert D.	Mihalyov	USANA Health Sciences
Jennifer	Milam	Arbonne International
Art	Miland	Individual Business Owner
Byron A.	Miller	Individual Business Owner
Donna	Mills	Arbonne International
Kathy	Moomey	Individual Business Owner
Ragon	Moore	Individual Business Owner
Ragon	Moore	Individual Business Owner
Mike	Morris	Individual Business Owner
Phyllis	Mullins	Individual Business Owner
Terry F.	Muniz	Individual Business Owner
John T.S.	Murphy	Individual Business Owner
Ray	Napolitano	Individual Business Owner
Bradley A.	Near	Individual Business Owner
Barbara	Neller	Individual Business Owner
Barbara	Neller	Individual Business Owner
Sandor R.	Ochoa	Individual Business Owner
Hitomi	Okamoto	Individual Business Owner
Louis	Otero	Pre-Paid Legal Services, Inc.
Chris	Oulahan	Individual Business Owner
Scott M.	Parsons	Fuel Freedom International
Danielle	Partain	Individual Business Owner
Kurtis	Partain	Individual Business Owner
Jackie D.	Patton	Individual Business Owner
Jeannette	Pedersen	Individual Business Owner
Jeannette	Pedersen	Individual Business Owner
Dominick J.	Perez	Individual Business Owner
Rae	Permann	Herbalife International
Denise	Pesce	Individual Business Owner
Rayna	Peyron	Individual Business Owner
Bob	Picha	Pichaboo Enterprises
Samuel J.	Plank	Individual Business Owner
Theodore J.	Pruitt	Individual Business Owner
Jonathon	Pugsley	Individual Business Owner
Rodney K.	Purvis	Individual Business Owner
Fletch	Rainey	Individual Business Owner

First Name	Last Name	Organization Name
Aundrea	Rammelsberg	Pre-Paid Legal Services, Inc.
Bonnie	Redding	Arbonne International
Eric V.	Reed	EEE VEE Marketing
Monna	Rice	Herbalife International
Ron	Richards	Individual Business Owner
Dian	Richold	Individual Business Owner
Philip P.	Rittman	Individual Business Owner
Ruth Ann	Roach	Individual Business Owner
Peggy	Roache	USANA Health Sciences
Mary	Roberts	Individual Business Owner
Vinicio	Rodas	Individual Business Owner
Chris	Roddy	Individual Business Owner
Elizabeth	Roma	Individual Business Owner
Kathleen	Romaine	Individual Business Owner
Teresa	Romeu	FFI/Fuel Freedom
Sarna	Rose	Individual Business Owner
Coral R.	Shipley	Individual Business Owner
Coral R.	Shipley	Individual Business Owner
Christine	Shirley	Sageant, LLC
Don	Slotnik	Pre-Paid Legal Services, Inc.
Terri	Slyter	Individual Business Owner
Nicole	Soll	Individual Business Owner
Lisa	Spears	Individual Business Owner
Cathy	Spencer	Individual Business Owner
Ruth	Sprout	USANA Health Sciences
Penelope	Staley	Individual Business Owner
Loyd	Stephens	Individual Business Owner
Deon O.	Stevens	Individual Business Owner
Robin A.	Stewart	Individual Business Owner
Jim	Sullivan	Individual Business Owner
Frances K.	Sutherly	FFI/Fuel Freedom
Steven J.	Swartz	USANA Health Sciences
A. Daniel	Sylvester	Individual Business Owner
J.L.	Terrell	Individual Business Owner
Christopher	Thompson	Details, Inc.
Christopher	Thompson	Details, Inc.
Scott	Thompson	Individual Business Owner
Yoshi	Tkuda	Individual Business Owner
Rijuta	Tooker	Individual Business Owner
Sue	Treat	USANA Health Sciences

First Name	Last Name	Organization Name
D. Susan	Turner	National Lending Corporation
Kim A.	Tyler	USANA Health Sciences
Thomas R.	Van Drielen	Individual Business Owner
Louis	Volpe	Individual Business Owner
Joel S.	Wagenheim	Reliv International Distributor
Mona	Webster	Arbonne International
Silence	Weeks	Individual Business Owner
Stanley M.	Widzins	Pre-Paid Legal Services, Inc.
Jim	Williams	4E Corporation
Kevin	Williams	Individual Business Owner
Richard	Williams	Individual Business Owner
Greg S.	Wirth	Individual Business Owner
Margaret	Wood	Individual Business Owner
Douglas	Woodward	Individual Business Owner
Bernice	Wosk	Individual Business Owner
Bernice	Wosk	Individual Business Owner
Jon	Wukasch	Individual Business Owner
Jon	Wukasch	Individual Business Owner
Kory D.	Yinger	Gas Four Less
Shelby	Yinger	Live Health 02
Carl E.	Yoder	CEY Enterprises, Inc.
Kim	Young	Individual Business Owner
Roger	Zamora	Individual Business Owner
Lorrie L.	Zamora	Individual Business Owner
Neal	Zandonella	Individual Business Owner