

June 10, 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

522418-70685



To Whom It May Concern:

I strongly oppose Business Opportunity Rule R511993. First of all, the company that I work for independently provides its new consultants with FREE information, FREE training, and FREE starter kits. There is NO out of pocket expense for the person who is being "sponsored" by our independent consultants. New consultants are able to join and begin their business immediately without any cost to them.

Secondly, we are required to provide each new consultant with a contract that specifically states they are an independent consultant, and they are not obligated to "work" for any length of time for the company. They understand that they are free to come and go within our organization at their discretion, and that they are free to move up in the ranks of leadership at any time.

New consultants are not contractually obligated to fulfill a certain number of sales or "bookings", and they are not locked into a time period in which they must be a consultant for our organization. They understand this information by signing our new consultant agreement and submitting it to our organization prior to them receiving their free starter kit, valued at over \$400.

Therefore, I feel this Business Opportunity Rule does not apply to our organization, and should not be imposed upon us as a company or as an organization of independent consultants. We furnish all potential consultants with information about the company, the business we conduct, the items we have for sale, the profit program and the potential profit that is available to them, as well as discuss with them our own personal stories of success.

We provide one-on-one training with the new consultant by doing their first "show" or sales event with them. Our company provides each consultant with a manual, training DVD, and a Start with Success guide that each "leader" or "sponsor" personally walks through with each new consultant, as well as FREE paperwork, catalogs and products from our product line that they are allowed to keep.

If the new consultant decides to never perform a single sales event, or if they stay with our company for 20 years, these products are free to them under no obligation. We also provide numerous training sessions throughout the month at various locations throughout the entire country that are FREE to everyone, and they are not obligated to attend.

By imposing this rule and having a "seven day grace period", many potential new consultants could, and will most likely, lose their excitement about the business opportunity. We do not "rush" people into making a decision, but we do encourage them to begin their business as soon as possible while the product and excitement of our company is still fresh in the minds of the potential consultant and their peers.

Please consider forgoing this rule and allow us to continue enjoying our business as it were meant to be – for some a full-time job. For others this might be a hobby. Imposing such a rule is unfair to the current consultants within these direct selling companies, as well as the potential consultants who are interested in our business opportunities.

Sincerely,

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Andie Groff  
Independent Consultant, Unit Leader  
PartyLite Gifts, Inc.

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