

TheWindstone Group, Inc.

June 1, 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:

The proposed New Business Opportunity Rule R511993, if not modified, will have a severe impact to the network marketing industry.

Having been in the network marketing business for the past 31 years, I find several issues in this proposal that would threaten the success of my business and the business of others.

1 The 7-day waiting period. In reality, I would have to sell my prospect twice, at the introductory meeting and again 7 days later. This would be a burden to the prospect, the company and me. I believe that this would result in a road block to my success. I do not understand the risk and/or concerns as most start-up costs are nominal. This is one of the major pluses of the network marketing business; you can own your own home-based business with little start up costs. I guess I would say, the American Dream...

2 Previous litigation: The release of any information regarding prior civil or criminal litigation whether found guilty OR innocent is offensive to me. While contributing through community service, I was president of a homeowner association. A developer chose to make their own standards that were not compliant with the governing covenants. It was my, and the Board of Directors, fiduciary responsibility to enforce the Rules and Regulations. The developer filed a suit against the association, the Board of Directors and each director and officer personally. After a lengthy time, the case was settled... Now, does this mean that I would have to disclose this litigation to each and every prospect and customers? I believe this would be a violation of my privacy and it would have no relevance to my business. I would support disclosing "guilty" verdicts of companies and the officers if they were involved in fraud and misrepresentation. After all, are we not a country whose judicial system is based on one is "innocent" until "proven guilty"?

3 Earnings disclosure: I am opposed to the requirement that any earnings claim statement made by the distributor or company to a prospect be validated with a detailed "Earnings Claims Statement Required by Law". It is a good practice to have an average earnings income statement as it is more realistic and should be available upon request. It has been my experience that most companies already have this as a policy.

4 Business Reference: This is quite cumbersome as most network marketing businesses are nationwide and in some cases, worldwide. I would find that having to disclose a minimum of 10 references nearest to me would be a violation of their privacy and could result in jeopardizing my business. The relationship with my distributors and customers is the key factor to my success. I would not want to compromise this in any way.

5 Disclosure of cancellation or refund policy: This is a good policy but again, it has been my experience that most companies already have this as a policy. This information should be available upon request.

6 Statistics on Refund and Cancellation Payments: This information, based on annual averages, should also be available upon request.

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All the "disclosures" that the proposed rule require would be an undue and excessive burden to me. This would be a hindrance, time consuming and an impediment in building a success business.

Network marketing has been a tremendous opportunity for me. While attending college to become a kindergarten teacher, I learned that the most important time in a child's life was his/her first 5 years. So, when our son was born my husband and I agreed that we would raise our son. We strongly believe that one or both parents should be at home with their children. Network Marketing was the perfect fit for me. I could work my own hours and earn a full-time income from the convenience of my home. Our son had one or both of his parents with him, one of us was ALWAYS there for him. One of my proudest moments was when our son returned from college for a week-end visit and said. "Thank you for always being there." You see, most of his classmates did not enjoy that luxury...

In thinking back to the age of 28 when I began in Network Marketing, as a quiet, insecure young lady, if I had been forced to comply with the proposed New Business Opportunity Rule, I would not have succeeded. If this ruling is past as read, I believe that you will be taking away a tremendous opportunity for many people who are just like me those many years ago.

The most important goal and achievement in my career is helping others to earn additional income for their families so they too can stay at home with their children. In my opinion, we would be a more prosperous country if mom and/or dad would raise their children and not have to look in the rearview mirror each morning as they drive away after leaving their child/children with someone else to raise...

Network marketing can be a full-time business but in most cases it is a share-time or part-time business. It is the extra \$100, \$200, \$500 a month that makes all the difference in the world to a family. It is the freedom, the education, the new home, the car repair, the vacation... When I began over 30 years ago it was for the extras, the private education, the new car, the new home, but today, it is a different story. For some, it is the ability to pay the day to day expenses, just to survive.

Please do not place road blocks and sand traps in the "free-market", placing unnecessary and difficult restrictions. As proposed it will affect over 13 million Americans in all 50 states. Network marketing is a thriving business in America with billions of dollars of products sold and billions of dollars going back into the US economy. This is a good thing. It has been my experience that network marketers are good people that care for others and truly want to make a difference in peoples' lives. We should be encouraging people to enter into network marketing, not discouraging them...

As Robert Kiyosaki said in his book, Rich Dad, Poor Dad, "If you are a person with big dreams and are also a person who would love to support others in achieving their big dreams then the network marketing business is definitely a business for you." I ask of you...do not crush our dreams...with unreasonable restrictions.

I am sincerely,

cc: George W. Bush, President of the United States Dennis Hastert, US Representative, Illinois Richard Durbin, US Senator, Illinois Barack Obama, US Senator, Illinois