

FROM: Martha Norvell

DATE: June 30, 2006

TO: Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Leaders of our FTC:

The purpose of this letter is to share my concerns regarding proposed Business Opportunity Rule R511993. I truly appreciate the FTC's intent to protect the public from "unfair and deceptive acts or practices" with this ruling. However, please consider the following points that may adversely affect my livelihood:

- **SEVEN-DAY WAITING PERIOD...**As an Independent Consultant with Arbonne International, a network marketing company with the highest of business standards and practices, I share the business opportunity with individuals on a daily basis. One key point in my practice is that I do not pressure anyone to rush into the business. In addition, the contract with anyone who enters the business clearly states the business transaction can be canceled at anytime. Any products ordered can be returned within 45 days of purchase.

To have a seven-day waiting period would create a tremendous burden of paper work and record keeping on my part. This burden would possibly slow the growth of my business to a point that the ruling becomes terribly detrimental to my earning potential and that of those who choose to team with me.

- **LITIGATION INFORMATION...**My life's career has been education. As an elementary school principal, I learned that "let's sue" was a regular threat in the times in which we live. I believe that such a ruling from you would both raise suspicion unfairly of quality companies such as Arbonne and suggest to individuals dissatisfied for any reason to look for occasions to sue their company.
- **REFERENCES...**To require disclosure of 10 prior Independent Consultants nearest to the prospective Consultant raises a huge concern over invasions of privacy and identity theft. (During the past year, my husband's credit card and ATM card has been invaded three different times. People all over are urged not to give our their Social Security information.) Many of my present customers are older and will not, because of fear of identity theft, give out this personal information. While it is fair to tell prospective consultants that their contact

information can be disclosed in the future to other buyers if you have such a ruling on references, I believe many will not enter the business because of this threat of invasion of privacy and identity theft. Again, my livelihood is threatened.

Thirteen months ago, at age 61, I chose to enter network marketing by joining Arbonne International. I made this decision for two very important reasons: First, I want to continue working and contributing to society as long as I can. Arbonne offers me this opportunity. My educational career could not have continued much longer. Second, we are blessed with sixteen grandchildren. Two of these families need our assistance financially to provide educational opportunities for the grandchildren. My dream is for my network marketing business to provide the income necessary for my grandchildren to attend college.

In the few months I have worked to build a team here in Mississippi, I have witnessed dreams come true for many families. I wish to continue to see this happen in the future.

As you continue your important role of protecting the public from “unfair and deceptive acts or practices”, please consider these issues that concern me. Hopefully, there will be alternative wording that will accomplish your mission without creating circumstances that may negatively affect the livelihood of millions of people, like me, making their living in network marketing. Thank you for every consideration.

Sincerely,

Martha Norvell

Copy to Arbonne International
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