

Cindy-Lea Niotta

July 15, 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 or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the **enthusiasm** and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly **imply** wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business

relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an **invasion of privacy** to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for a little more than one year. I became a Consultant because I love the products and our family was in need of a second source of potential income. Since starting my Arbonne business, I have developed a wonderful team of Independent Consultants across the country & Canada and together we are helping our families enjoy better lives.

I have had a lengthy career with various investment companies. With that came a grueling schedule that kept me from my family. After years of financial security, I chose to retire and stay at home with my children. I am a resident of Southern California where the cost of living is rather expensive. We have had no alternative but to make personal sacrifices in order to be able to afford to live here. More importantly, we have been forced to choose between economic stability and time with our families, thus are faced with the negative changes in our society influencing our children. Network marketing has become the new way of thinking for those who want and are striving for a better way of life. That is why Arbonne is proving to be an attractive alternative to what has sadly become the norm, the absent parent.

Besides the obvious financial advantages that Arbonne has offered, I have experienced personal growth & development that can't be measured. I truly believe that because of this past year in Arbonne, I am a better person for myself and others as well.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Cindy-Lea Niotta

"Happiness is found in the journey... not at the destination!"



Cindy-Læa Niotta  
Executive Regional Vice President  
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