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PRIVATE & CONFIDENTIAL

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

Ladies and Gentlemen:

We are writing you this letter in response to your proposed rules relating to U.S. business opportunities, especially as they relate to direct selling businesses. We feel privileged to have the opportunity to share our thoughts and concerns about your proposed rules and regulations.

We have been involved in the direct selling business with Amway and Quixtar for over 15 years. Our business has not only provided additional income for our family, but it has also provided such a wonderful atmosphere whereby we are able to build our business and maintain a balanced, positive family life. We are excited about the team of independent business owners we have the opportunity to work with and consider our business support team to be some of our best friends and mentors. Our goals for our business are to continue to support our family both financially and non-financially, and to provide convenient products and services to our business team and clients. We are excited to continue to build our business and take full advantage of our country's free enterprise system.

When we had the opportunity to register with the business opportunity, our business support team provided us with more than enough information and time to make an educated decision about the business. In the 15 years we have been in the business, we have in no way felt pressured or intimidated to make decisions regarding our participation in the business. Our business support team respects our personal privacy and supports our goals in the business.

When we register new independent business owners in our business, we provide them with the same level of information and time to review the information that we were given. It's communicated with our potential business partners up front that our business is not a get-rich-quick scheme, but a legal, ethical and moral business that takes time and effort to build. Our start-up business kit will cost approximately \$120, which includes business registration fees and a supply of every day products and services. Our business kit and products come with a 100% satisfaction guarantee. Additionally, we recommend that our business prospects purchase some business tools in the amount of \$50-\$100 to help them build their business. These business tools are completely optional and are not required to register in the business.

Here are our responses to some of your proposed rules and regulations as follows:

Requirement of 7-day waiting period

We feel that this proposed rule is not necessary or productive for our business. We already offer a money-back guarantee if the potential prospect is not completely satisfied. Most of our new business partners who join our business team want to begin their businesses right away. We do not pressure any of our business partners to register with our business. We have a great business today and it will be even a better business tomorrow. We suggest eliminating the requirement of a 7-day waiting period.

Provide prospects a list of 10 "references"

We feel that this proposed rule infringes on our personal rights and privacy. We already share with our prospects a detailed list of the business support team members that they will be working with. Information regarding our business support team is readily available in print form or can be accessed free of charge from our business support team's website. We suggest eliminating the requirement to provide 10 references.

List of lawsuits, arbitrations, or other legal claims

We feel that this proposed requirement is too broad and encompasses too large of an area to be fully effective as intended. This proposed rule would open up our business and other legitimate companies to probable and potentially false and inaccurate accusations. Until the legal atmosphere of our society today protects those falsely accused, this proposed rule will harm even those businesses like ours that are legitimate, legal and ethical. We suggest eliminating the requirement to disclose past litigation.

Requirement of disclosures for every income claim

We feel that this proposed rule is already addressed in the business support tools available in our business. When we share the business opportunity with potential prospects, they are provided with detailed information and disclosures relating to the "average monthly gross income for 'active' independent business owners." During a presentation to potential business prospects, we fully disclose how income is made and calculated in our business. We give our business prospects ample time to review any business information and answer any and all questions they have before they decide to register with our business. We suggest that if such disclosures are considered necessary, the requirement provide for a simple, standard and easily understood disclosure.

Requirement to provide prospects with personal financial information

We feel that a requirement to disclose personal financial information to support any income claim is a clear violation of our personal privacy. We already provide our prospects with proper substantiation regarding any income claim in our business. Should any Federal or state agency require disclosure of personal financial information due to a pending Federal or state investigation, those disclosures should be made available at that time. We suggest that the requirement to provide prospects with personal financial information be eliminated.

We appreciate the opportunity to share our thoughts and suggestions regarding some of your proposed rules and regulations. We both agree that the goal is to make sure that consumers and potential business partners have the information needed to make informed, educated decisions about participating in a business opportunity. Should you have any questions, comments or require any additional information, please do not hesitate to contact us.

Very truly yours,

Shawn & Jody Schulenberg