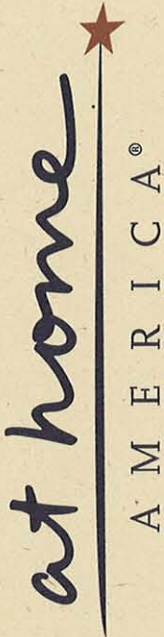


Real life with style.™

May 19, 2008



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

Ref: Business Opportunity Rule, R511993

Dear Sir or Madam:

AtHome America, Inc. (AtHome) is a 25 year old Chicago-based direct selling company that sells home decorative items throughout the United States using independent contractors who are called HomeStyle Specialists. These HomeStyle Specialists use the party plan method of selling whereby a friend or relative host guests in the home and the company's products are shown through the use of samples and catalogs. As such, these HomeStyle Specialists are considered to be "direct sellers" as referenced in your Business Opportunity Rule, R 511993.

AtHome is an active member of the Direct Selling Association and has been following the proceedings at the FTC regarding the proposed changes to the Business Opportunity Rule. We acknowledge and support the FTC's important role in consumer protection and we share in the FTC's commitment to protect the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as our own.

AtHome sincerely appreciates the FTC's good-faith efforts in considering the views of thousands of direct sellers and we concur with your conclusion that revisions to the originally proposed rule were necessary in order to exempt legitimate direct sellers from coverage. We also appreciate the openness that the FTC has had with the Direct Selling Association since that openness translates into benefits to thousands of direct sellers across the United States.

In conclusion, AtHome is fully aware of and concurs with the comments and suggestions that have been submitted to the FTC by the Direct Selling Association, and trust that these helpful recommendations will be incorporated into the new business opportunity rule as you work to clarify and implement the improved and revised rule. I personally thank you for the work that you do and for your efforts concerning this issue.

Sincerely,

Leonard A. Robertson  
Chief Financial Officer

LAR/kk