

May 27, 2008

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

Re: Business Opportunity Rule-R511993

Dear Sir or Madam:

I am writing regarding the Federal Trade Commission's (FTC) Revised Proposed Business Opportunity Rule, R511993. We appreciated the FTC's good faith efforts to consider the views of thousands of direct sellers and concur with your conclusion that revisions to the originally proposed rule were necessary to exempt legitimate direct sellers from coverage.

As a direct selling company and member of the Direct Selling Association, we recognize and support the FTC's important consumer protection role and share your commitment to protecting the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as our own.

We also fully concur with the comments and suggestions submitted to the FTC by the Direct Selling Association, and trust that you will incorporate these helpful recommendations as you work to perfect, clarify, and implement the improved and revised business opportunity rule.

We appreciate your consideration of our views, and if you require additional information, please do not hesitate to contact me.

Sincerely,

Anita Whittington  
Risk Manager