

Virginia Gianakos
Friendly Fashions

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

I would like to express my concerns about the proposed Business Opportunity Rule. If adopted, this rule could have a devastating impact on our industry, requiring direct selling companies to drastically alter their sales methods and placing additional burdens on direct sellers such as myself in order to comply with federal law. While I appreciate the intent to prevent companies that do not operate with integrity from taking advantage of consumers, I am concerned that your proposed legislation will negatively impact the ability of legitimate companies from growing their businesses.

This proposal will cast all direct selling companies in a negative light, cause unnecessary record keeping and administrative problems and delays.

I have spent the past several years trying to build a home based business to supplement our family income in order to raise two children and pay for college expenses. I tried a telecommunications business that folded and have found a home with Weekenders USA, a direct sales company that has been in existence since 1988. Weekenders helps women like me build a legitimate home-based business that I can do on my own time schedule with minimal financial investment and great potential rewards. I love being able to present high-quality clothing that can mix and match and is easy care to other professional women.

I was a single mother until August of 2000. While raising my oldest daughter, I earned an MBA while working full time. Weekenders will enable me to help provide for my youngest daughter without the long hours required by another job or additional schooling. Since joining Weekenders, I have been able to develop other women by helping them start their own fashion business, making new contacts and enriching the lives of others. If you institute a 7 day waiting period, you will prevent me from growing my business and providing for my daughter's future college expenses.

Here are my specific concerns about the rule:

1) Litigation Reporting: This does not distinguish between winning and losing lawsuits and therefore places legitimate companies in the same light as dishonest ones.

2) References: Causes unnecessary burden as it is impractical to find 10 nearest distributors and impacts Privacy issues due to ID theft and safety

I totally understand that are fraudulent groups out there and I have incurred losses due to a bad one, but the FTC's proposed rule would unfairly target legitimate direct selling businesses and cause me personal hardship.

While the intention of the FTC is to prevent fraud, for those of us whose companies follow ethical business practices, these requirements would add an administrative and financial burden as well as making the business more complicated and time-consuming. In an effort to prevent this from happening, I am asking each of you to reconsider the impacts of this ruling.

Sincerely,

Ginny Gianakos, Independent Fashion Coordinator

CC:

Weekenders USA, Inc

Attn: Rosemary Redmond, President

Glenda Duncan