

Renée Woodell
Unique Boutique

June 13, 2006

Dear Sir or Madam:

Having reviewed the proposed Business Opportunity Rule R511993, I am compelled to express my concern over a rule that I fear could make it extremely difficult for me, as well as for other current and future Weekenders fashion coordinators to build, or even maintain their businesses. While the FTC is charged with protecting the public from “unfair or deceptive acts or practices”, I feel that the Business Opportunity Rule R511993 is overly burdensome.

As I understand it, one section of the proposed rule would require a seven day waiting period prior to enrolling new Fashion Coordinators. With the value of the entry paks purchased by new Coordinators to begin their business ranging from \$150 to under \$500, our business opportunity is appealing to women who would be unable to start their own business requiring a storefront, inventory, and other investments necessary to begin their venture. If prospective Fashion Coordinators are required to wait seven days to enroll after they’ve made the decision to start their new business, it would seem the same as requiring a customer who purchases a major appliance, or a vehicle, to comply with a seven day waiting period prior to taking possession of their purchase. Not only is the requirement unnecessary, but it tends to breed doubt in the mind of the consumer, or new Fashion Coordinator. Weekenders already has a check and balance in place that protects the new Coordinator in that they have a 90% buy back policy for merchandise purchased by a Coordinator over a twelve month period of time. If the seven day waiting period goes into affect, the increase in required paperwork will no doubt severely curtail interest by potential Fashion Coordinators in beginning a Weekenders business, while also discouraging current Fashion Coordinators from continuing the businesses they’ve worked hard to build.

Another requirement of the proposed rule would involve the release of any information regarding lawsuits Weekenders had been named in that claimed the company had misrepresented its business or engaged in unfair or deceptive practices. In the litigious society we live in, anyone or any company can be sued whether the allegations are founded in truth. The proposed rule would not differentiate between cases that Weekenders had won or lost, and just as the seven day rule could cast the company in a bad light, requiring information about lawsuits to be shared with prospective Coordinators, no matter their outcome would complicate an otherwise simple decision for someone interested in taking advantage of an opportunity that could make a positive difference in her life.

While each of the above stated reasons concern me, I feel that the requirement to disclose a minimum of 10 references from current or past Fashion Coordinators who live closest to the prospective coordinator would do the most harm to a Fashion Coordinator’s business. Not only does the ten reference requirement put the named Fashion Coordinators at risk of identity theft, but it would be extremely burdensome to the current Coordinator who would have to keep an updated file of references that she had current permission to use for the purpose of recruiting. This task would be particularly time consuming and provide administrative challenges for independent business women who

don't have the luxury of additional staff to assist with implementing this requirement. Even large businesses don't have to comply with such a requirement despite the fact that their increased staff size would make doing so more feasible than for independent Fashion Coordinators with Weekenders. In addition, by including the verbiage "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" in a contract, potential Coordinators will no doubt be discouraged from entering into their own business as a Fashion Coordinator for fear of identity theft or loss of privacy.

I have just celebrated my four year anniversary as a Weekenders Fashion Coordinator. While I was originally attracted to Weekenders because I loved the styles and easy care features of our clothes, I started my business because my daughter was going to college and we needed additional income to cover large tuition payments. I increased my involvement by working to become an independent Sales Manager when my son entered college two years later, giving us double tuition payments. My income as a Weekenders Sales Manager is necessary for our family's financial security. I fear that by approving Business Opportunity Rule R511993, my business and our family's financial future would be at risk.

While I appreciate the work that the FTC does to protect consumers, I believe this proposed new rule has many unintended consequences. Weekenders is already subject to regulations imposed by State and Federal laws designed to protect the consumer, the Coordinator and the company and I feel that the approval of Business Opportunity Rule R511993 would simply be imposing additional restrictions that would go past the point of diminishing returns.

Thank you for your consideration of my comments.

Sincerely,

Renée R. Woodell