

**Tamara Boschman**

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

June 15, 2006

Dear Sir or Madam:

I am writing this letter regarding the proposed Business Opportunity Rule R511993. I am concerned with the negative ramifications it may have on my business. I am an Independent Distributor with Sunrider International, a company that is of high reputation, stability and positive influence in people's lives all over the world for over 24 years. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to continue my successful Sunrider® business.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Distributors. I don't know of ANY company or business that would benefit or survive with this type of rule. When people make major purchases such as cars, furniture or other expensive items they need only prove that they have the money to make the purchase (cash or credit cards take minutes not days) Sunrider's Starter Pack costs only \$140 and comes with a generous 60 day return policy. Most legitimate, reputable, companies provide the consumer with a money-back guarantee to eliminate any fear on the consumers end and maintains a companies reputation of positive customer satisfaction. This waiting period gives the impression that there might be something wrong with the plan. Sunrider goes far beyond customer satisfaction by also having a 90% buyback policy for former Distributors applicable to all products purchased within the last twelve months. Another problem with the seven-day waiting period is the administrative burden of keeping very detailed records when I first speak to someone about Sunrider, and then having to send numerous reports to Sunrider headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Sunrider is found guilty. Otherwise, Sunrider and I are put at an unfair advantage even though Sunrider has done **nothing** wrong. Not to mention once again the administrative burden

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. In addition, giving away this information could

damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Sunrider headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been an Independent Sunrider Distributor for more than 17 years. Originally, I became a Distributor to enjoy the fabulous health benefits that the products afford me. However, as I became more knowledgeable in business, I realized this was a wonderful opportunity to create extra income and to have a business that I could do, well into my retirement years. This business, more than any other allows me to HELP other people create financial stability in their lives. This is saying something in this age of downsizing, rising inflation and instability. For many of us, we are looking to simplify our lives. This wonderful, part-time business allows us the opportunity to reduce complications and stress by creating another stream of income in an affordable and simple manner. With these proposed regulations, that would be lost, People would be less inclined to participate and instead of positively improving our economy, a business model and stream of income would be extinguished. That is saying a lot since recent statistics show that Direct Sales is a healthy, growing industry with 49 Million people involved and over \$89 Billion in sales. Even the investing guru Warren Buffet is getting involved in this industry!

I appreciate and respect the work of the FTC to protect consumers, however, I do not believe it needs to be at the expense of the Distributors or an entire business model. I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

Tamara Boschman