

ORIGINAL

522418-70184



Mardella Newkirk
[REDACTED]
[REDACTED]

June 3, 2006

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

Re: Business Opportunity Rule, R511993

To Whom it May Concern:

I am writing this letter to express my strong opposition to the proposed Business Opportunity Rule R511993. I understand that it is the responsibility of the Federal Trade Commission to protect the public from "unfair and deceptive acts or practices," but the rule as proposed would make it very difficult for me to operate my business as a Shaklee Independent Distributor.

Most of the people who sign an application to purchase Shaklee products at a wholesale price do so as customers and receive a membership discount like Costco, for instance. Later on, and if they like the product, they might want to become a distributor; if they do all they have to do is supply Shaklee Corp. with their social security number. They are only charged a basic office processing cost for their membership, which includes their distributor capabilities if they should choose that in the future, of \$19.95. This is far less than most consumer purchases. Additionally, a seven-day waiting period would do damage to my business and besides Shaklee Corporation already has a 100% money back guarantee on nearly all of their products and warranties and 60-day money back on a few appliances. Our customers are valued and protected already. For instance, I have a new member yesterday who wanted to purchase a reverse osmosis water purification system; she and her husband are older and needed the membership discount and the water system ordered immediately for her health purposes. If she had to wait another week, she would have said, "forget you," and gone to a store to purchase something that might not even be as good as what she wanted from us.

There is also the problem of identity theft today. Shaklee Corporation and myself as well refuse to give out our customers' personal information. Providing 10 references would be easy to do, but would be inconvenient, make some customers angry, and would damage my business.

The proposed rule calls for release of information regarding lawsuits that allege misrepresentation no matter if they were found innocent. This is a huge burden and also illogical to me. Let them call the Better Business Bureau for one way. People can do

their own research today also—get on the web and you can find out nearly everything you want to know about a company.

Individuals need to carry some responsibility for their own lives. It is impossible for the government to take care of all of its citizens as if they were children and protect them from every evil or damage that might happen in their lives. The media does a very good job at making people aware, also.

While I appreciate the work of the FTC, I believe this proposed new rule has many unintended consequences for direct sellers. If any new distributors discovered what they would have to put up with here if this proposal were to happen, I just plain would not have any new distributors and I would lose my business in time.

Thank you for your time and consideration to my concern.

Sincerely,

A large black rectangular redaction box covering the signature area of the letter.