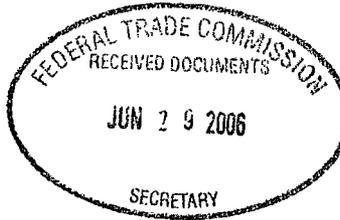


522418-70577



C.J. LaBracke, Chief Executive Officer
John C. LaBracke, President
June 20, 2006



Federal Trade Commission
Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

To Whom It May Concern,

I am writing today in opposition to Business Opportunity Rule R511993 now being considered by the FTC.

Although I understand that you are trying to eliminate "unfair and deceptive acts or practices", the scope of this measure would make it difficult for me to grow our company by offering a legitimate opportunity to people who would like to supplement their income by selling our products.

I am the C.E.O. of Lifetime Cookware Associates in Waukesha, Wisconsin. I have been with Lifetime for 50 years and have never had to resort to unethical practices to succeed in my business.

I am especially opposed to providing each potential new dealer with information on 10 other Lifetime dealers in their geographical area when they apply to become an independent dealer with my company. I believe this raises a privacy issue with those 10 dealers who may or may not wish to have their names and addresses released to people they don't even know.

We recruit from our customer base and there is no fee for them to try to earn extra money.

I would appreciate your consideration of my concerns and I would be happy to provide any additional information you might need from me to consider my requests.

Thanks for your help.

Sincerely,


Charles LaBracke, CEO
Lifetime Cookware Associates


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UN MEJOR ESTILO DE VIDA™
