

Tony Osborn
Herbalife Independent Distributor

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

July 12, 2006

Dear Sir or Madam:

I am writing to express my concerns with the FTC's proposed Business Opportunity Rule R511993.

I started in Network Marketing 11 years ago as an Herbalife Distributor. It was a choice I made because at the time, I had graduated with massive amounts of debt & no job opportunities that would allow me to repay these loans and other debts while sustaining an average American lifestyle. The choice to start with Herbalife seemed to be the only viable way I could see to supplement my income at the time. That first month, I was able to help 9 people start using the nutritional products. They all received incredible results in their energy, their weight loss, and well-being. By helping them, I earned an extra \$550 that month, that I was able to use to pay down my debts. By my 3rd month, I was earning an extra \$1200 a month part-time by helping people with the products. It has now turned into a business that is in a number of different countries, with people benefiting from the nutritional products daily – as a result it has become a business that supports me completely.

In the proposed FTC Rules, before having someone get started, I would need to provide them with contact information of 10 people in their area who have recently started. Unfortunately this would never give them a clear picture of what's available to them. As an example, at the same time I started, my brother decided to join the business as well. Though he got tremendous results using the products (he lost 62 pounds) he never attended trainings consistently, or made efforts to help others start on the products. As a result, he has better health, but has not financially benefited from the business. Should someone ask my brother how the business fared for him, he would say, it was not beneficial to him. The person he speaks to, may never find out that with a more dire financial background I've used the same opportunity to build a substantial business by taking advantage of the training classes & acting daily on what I'm learning.

Also in the proposed FTC Rules, I would be required to wait 7 days before I could get started with the Herbalife business opportunity. In my case, I may not have had the patience to get started and may have missed the opportunity that has changed my financial future.

I know that many people make rash decisions, and need to be protected from themselves and the overwhelming lack of strong work ethic among a percentage of Americans. However, I feel that the objectives of this FTC action will not change people's work ethics, and will not prevent people from making rash decisions. Rather it will hurt hard-working individuals like myself who will be required to take more time away from daily business activities to attend to non-productive tasks as those required by the proposed FTC rules.

Sincerely,

Tony Osborn