

Melissa Rogghe
Lia Sophia

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Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Lia Sophia Advisor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Lia Sophia products.

I am part of a growing Direct Sales business called Lia Sophia. I have been in this business since September of 2005. I was 8 months pregnant when I started Lia Sophia. Originally, I became an Advisor in my company because I felt the products were exceptional and I wanted to earn some additional income. I was looking for a full-time job that could work around my schedule and let me spend most of my time at home with my daughter. My Husband is a Campus Minister on the campus of Miami University in Ohio. This business is a support system for that ministry. I have a degree from Ferris St. University in Michigan, in Computer Science and am a highly educated person. There for I was looking for something in which I could excel. The Direct Selling business in general is a wonderful opportunity and I have found my place with Lia Sophia. We are a business that prides itself in doing our best for the customer and for our hostess (the people we conduct the Booking for). We tell the truth about what the business offers and give real estimates about how much can be made, along with showing them what we have made. We let the recruit make the decision on whether they would like to start as an Advisor. It is critical to our business that we make sure that the recruit knows what is involved. We do this because we want to build a healthy business that strives and survives, therefore we do not want people that will drop out because they did not know all that was involved. We try to inspire and encourage our recruits to develop their own business and business ethics to the highest quality. Everything our recruit does reflects on our business and business ethic.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Advisors. Lia Sophia's sales kits only cost \$150. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because Lia Sophia already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Lia Sophia and will then need to send in many reports to my company 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 Lia Sophia is found

guilty. Otherwise, Lia Sophia and I are put at an unfair advantage even though Lia Sophia has done **nothing** wrong.

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. Also, 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 Lia Sophia 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 appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

Melissa Rogghe