

Richard Baumbusch

July 11, 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

Dear Sir or Madam:

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

I am an independent Herbalife distributor and my wife and I have been growing our business for almost two years now. Herbalife has been a huge blessing for us since we are victims of corporate downsizing and have lost out on retirement benefits that our 25+ years in Corporate America should have been afforded to us. Herbalife has allowed us to take control of our financial future with an opportunity we simply couldn't duplicate (particularly at our age) back in the corporate world. And, not only are we improving our financial situation, we are helping our downline prosper as well. Herbalife is a win-win proposition for the company and its distributors and not the zero-sum game we experienced in our corporate jobs.

The proposed Rule R511993 would create an unreasonable burden on us in expanding our business because we live in a "now" society. People want it "now."! Pizza delivered to the door. No wait doctors in WalMart and 1-hour eyeglasses. When we pique a new distributor's interest they are ready to get going, now! We work to help our new distributors earn real cash within 48 hours. They want to become a distributor and we want to help them begin to realize their goals right away. If we were requiring a substantial investment to become a distributor I might be able to understand the importance of some of your Rule's provisions, but you can become an Herbalife Distributor for less than \$50.00, and as a Distributor I make absolutely nothing (\$0.00) on that transaction. I only benefit from a new distributor when they make money. So, I have no incentive to mislead, and every incentive to help a new distributor make money. So where is the fraud? Since the financial risk is less than \$50 and since there is no incentive to mislead, why burden me with additional rules? Why add more bureaucracy to government and why prevent a new Distributor from starting to make money right away?

While I understand the importance of preventing consumer fraud, it would seem that the proposed regulation needs to be re-thought so that independent, entrepreneurial, direct sellers like me aren't asked to shoulder an unreasonable burden in growing our business, and allowing others to prosper from our legitimate business and business model. Please give careful consideration to my views and pay particular attention to the

importance of enabling dedicated direct marketers like me the ability to grow our business unencumbered by unnecessary, government imposed steps and paperwork.

Sincerely,

Richard Baumbusch