

Tricia Confoy
Independent Consultant, Executive Regional Vice President
Arbonne International

July 13, 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
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I have been an independent consultant with Arbonne International since March 2005, and have had a wonderful experience. I previously worked in the corporate world for a big-six accounting firm and a software company for many years, neither of which provided options to work from home once I had children. Having a traditional business background, I was skeptical of the network marketing industry and was concerned about somehow being scammed or being involved in a pyramid. However, when I researched Arbonne International's products, training, and reputation, I was duly impressed. Arbonne is a top-caliber company, seriously committed to ethics, producing products of a higher quality than I can find in retail stores, with a supportive environment to foster my business. There is some confusion in the marketplace about what business opportunities are genuine, but I don't believe that the proposed Business Opportunity Rule R511993 is the way to rectify that situation.

My income as an independent consultant has enabled me to take the stress off of my husband as the sole provider for our family. It will pay for private school education for my son this coming school year. It gives me the freedom to be home with my children during their formative years. Arbonne gives me a chance to work with people who want to work for a better life, and it gives me tremendous satisfaction to help my clients choose healthier products for their families. I have worked very hard to build my business, and now I believe that the network marketing industry is the best there is. I teach and train people to share Arbonne's products, and I have seen the products and the business make such a positive difference in the lives of people on my team.

I am concerned that the proposed rule in its present form could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

The proposed 7-day waiting period to sign up new Consultants is highly restrictive. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives

the impression that there might be something wrong the Arbonne opportunity. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices----whether or not the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Tricia Confoy