

Julie Salva

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 am writing in reference to Business Opportunity Rule R511993. This proposed FTC ruling will have a significant and serious impact on my business as an independent demonstrator with Stampin' Up! Although I appreciate the goal of the FTC in protecting the public from unscrupulous practices, the current proposal appears to fall short of this goal.

One of the significant aspects of my business is the ability to share the business opportunity with others. This is the very foundation of direct sales. For those that choose to accept this opportunity, the possibilities for growth, both financial and personal, are tremendous. A major advantage to offering the independent demonstrator opportunity is the fact that, if NOTHING else, the new demonstrator will receive an incredible value on stamping product, for the price of \$199.00. As you are aware, this is significantly less than the Federal Franchise Act threshold. In fact, in my family, this can cost less than a trip to the grocery store!

Further impacting my ability to share the business opportunity is the 7 day waiting period requirement that Rule R511993 mandates. Not only is this burdensome, it is simply not necessary for my business, as Stampin' Up! offers to repurchase all of its products, for up to one year, at 90% of its cost. In addition, Stampin' Up! also offers a 3 day period in which a potential demonstrator can simply change his/her mind, at no penalty. These two provisions currently address that which R511993 seeks to control. Again, this ruling is not necessary and will create significant disclosure documentation requirements, which in all honesty, will require time that as a wife, mother, and small business owner with one employee (Me!) I do not have.

I have further concerns with the privacy disclosure rules advocated by R511993. In my business, it is to my competitive advantage to keep downline lists private. Furthermore, with the rise of identity theft, I would anticipate that telling prospective demonstrators that I will be forwarding their personal information to subsequent recruits will not be perceived positively. Although I welcome the opportunity to provide references, and currently do, I do not want to be required by law to provide information that, in my opinion, is not mine to give.

My final concern relates to the litigation proposal requirement. It is my understanding that I must disclose this information EVEN IF my company has been found innocent. Furthermore, I must also disclose information that in all likelihood has nothing to do with MY independent demonstrator status. Although I would expect to disclose any guilty findings against Stampin' Up! or I, the decision to require me to provide any and all litigation seems unnecessary.

I represent many direct selling demonstrators. Although I am a college graduate, and a former teacher, I have currently chosen to stay home, and together with my husband, raise my child. Direct sales, and in particular, Stampin' Up! have provided me with an opportunity for the past 3 years to not only be a mom, but also be a business woman. My independent demonstratorship is mine, something to call my own, and in a very small way, my foray into the business world. For this opportunity, I will forever be grateful. I am also able to contribute in a small way to the financial well being of my family. In fact, I am currently shopping for golf clubs for my nine year old son! How wonderful to be able to do this with "my" money! In addition, I have made friends all over the country with many different people.....people who I would never have come in contact with if not for this opportunity.

Please be assured, I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences, and that there are not only less burdensome alternatives, but current laws in existence that will achieve the same goals. Although there may be problems that may exist from time to time in the industry, as in many other industries, please recognize that the vast majority of the businesses that will be affected by Business Opportunity Rule R511033 are composed of people just like me.....stay at home moms with a little something to call our own. A complicated federal law may make it impossible for many of us to continue.

Thank you for your consideration of my concerns.

Sincerely,

Julie M. Salva