

July 08th, 2006.

FEDERAL TRADE COMMISSION

Dear Sir or Madam:

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

I'm a M.D. and I became Herbalife Distributor 13 years ago. After 5 years working part time in Herbalife I decided to do full time. The results of the good nutrition in my relatives, my patients and me have been amazing. Also I found a fantastic way to help other people with their income.

The Rule R511993 will take away the "magic and simplicity" of doing Herbalife PART TIME because it will become very complicated to sponsor new people (especially for the 80% of my organization who work from home). When we do a home or an office meeting to explain the business to friends, relatives and referrals we want the people to take decisions based in the results of the products and the income. Thanks to the technology now we can fill an application on the internet so the prospect can join Herbalife and see his account on line immediately. The Rule R511993 will make this process impossible because we'll have to wait a week, etc. We will lose a lot of people who will think better not to join if it's too bureaucratic.

As a MD I'm in contact with a lot of sick people who could avoid a lot of problems if they would receive a good nutrition and an Herbalife distributor can help with this person by person.

I agree with the FTC to create rules to avoid consumer fraud but the rule R511993 will create a negative impact in our business. The Herbalife distributors have a very good name in the network marketing industry because the high level of ethics and we train the people to do the business in the correct way.

Sincerely,

Guillermo Luna
Herbalife ID