

Dear Sir or Madam:

My name is Sarah Wood and I am an Independent Consultant for Arbonne International. I am writing this letter out of concern for my livelihood and for the livelihood of many other legitimate business owners in the direct selling industry.

I have been selling Arbonne's products since April of 2004. I have worked carefully to build a clientele who trusts me with their orders and sends me referrals on the basis of my excellent customer service and professional conduct. Over the last 2 years, I have built a team of inspirational leaders who also enjoy the benefits of building their strong client relationships.

Because of Arbonne, I have set goals for myself that I could have only dreamt before. And the exciting part is that I have given hope to so many others who needed it more than me. I am a part of something wonderful. How do I know? Because I read the goals of my team members and feel honored to know that their goals are a direct result of the Arbonne business opportunity that I offered to them. I truly feel blessed.

The proposed Business Opportunity Rule R511993, in its present form, is confusing and unclear of its purpose. More important, it could prevent me from continuing as an Arbonne Independent Consultant and jeopardize the future of Arbonne's positive impact on so many deserving people.

I understand that the bulk of this rule 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 continue my honest, ethical business of selling Arbonne products and sponsoring others into my business.

One of my major concerns lies within the "7-day waiting period" to sign up new Consultants. Arbonne Starter Kits cost a nominal amount of money (\$29) and it doesn't make sense to ask a client to wait for such a marginal purchase. The clause actually casts a false light onto the Arbonne opportunity, making it seem "sketchy".

In addition, we are a **product driven** business. People sample our products and then want to buy them for immediate use. It is hard enough to ask them to wait 3-4 days for their products to arrive much less asking them to wait during a 7-day period before I could even process the order. This could seriously limit my business' growth.

Another concern - 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. How could this possibly be fair?

Last year, a person sued the fast-food restaurant Wendy's for eligibly finding a severed finger in the chili. Would it be fair to post this on every menu, TV commercial and customer receipt even though the accusation was completely fabricated? Why is the direct selling industry being treated differently? A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I could provide 10 times that amount of happy consultants in my business but I would feel like I was violating their trust. My clients trust me with their personal information and I protect it. To release my clients' personal information to anyone would be not only a disservice, but a blatant invasion of their privacy.

Also, 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". If I were a prospect my thought would be... "Why in the world would my information be available to strangers?" In this day and age of identity theft, the idea of personal information floating out in space is not only a deterrent but is also suspicious. Prospects are and will continue to be concerned about their privacy – rightfully so.

I truly appreciate the work of the FTC in protecting consumers because I too aspire to run a positive, ethically sound business myself. The problem is that this proposed new rule would have many detrimental (and unintentional) consequences. Please consider alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful, honest small business owners, like me.

Thank you for your time, your understanding and your consideration

Sincerely,

Sarah Wood  
Glendale, MO