

Karen E. Mikalaski

July 16, 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 this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it 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.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. 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 with the Arbonne opportunity and our industry. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. 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. It does not matter if 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. I always operate from the most ethical position possible and my clients know this too – this may lead them to question Arbonne and my business practices unnecessarily.

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 and would not want mine disclosed either!

I have been selling Arbonne products for nearly 2 ½ years and as a result, was able to quit my stressful Corporate job, where I was constantly on the road and away from my newborn, working 50+ hours a week. Arbonne has allowed me to be home and raise my children, much less stressed and present for them. It has also allowed me to continue to contribute to my family finances since I was the main income earner when I left my position. Arbonne has given me the amazing opportunity to start my own business, which would not have been possible otherwise. I was not prepared to invest thousands and thousands of dollars, risk and more time than my

corporate job required in order to start a business so I could be home raising our children. And, unfortunately, we would not be able to do this on my husband's income. Arbonne has been such a huge gift to us and with the proposed ruling, my income would be significantly jeopardized, and I'd likely have to go back to Corporate America. This would mean that our daycare expense would also triple and I'd be back to sending my children off to have someone else raise them for us. That would really be detrimental to our family. Since starting my Arbonne business, I have had the privilege of sharing this amazing business with others and have developed a team of over 100 Independent Consultants across the country. Together, we are helping our families enjoy significantly better lives, with less financial stress and more family time.

I truly 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,

Karen E. Mikalaski
Independent Consultant and Executive Regional Vice President with Arbonne International