

**Veronica Preblich**  
Arbonne International

July 17, 2006

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 my 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. 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.

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 have been an Arbonne Independent Consultant for just over five years. I became a Consultant because I love the products and our family was in need of a second source of potential income. My husband and I used to have jobs in the auto industry in Detroit as corporate employees. My Arbonne business allowed me to leave my corporate job to stay at home with my family, but still contribute to the family income. My husband was downsized from his company 3 years ago, and could not find employment in his field. Today, because of

Arbonne, I have been able to promote to the highest level of the company, National Vice President. Our Arbonne income supports our family, and it is the only income we have. Since starting my Arbonne business, I have developed a team of at least 4000+Independent Consultants across the country and together we are helping our families enjoy better lives. Many people do not realize that network marketing is a trend that will continue, and that our industry is one of integrity. People build businesses because they want to help others, and that is what I do. Any industry will have a few questionable or outright fraudulent companies. We see this with companies like Enron, yet there are no similar proposed rulings in corporate America such as what is being proposed within the network marketing industry. It wouldn't make sense in corporate America, and I don't believe it makes sense in the Network Marketing industry, either.

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,

Veronica Preblich  
Independent Consultant and National Vice President  
Arbonne International