

Shari Weller
Arbonne International

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Dear Sir or Madam:

I am writing this letter because I am greatly 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. Traditional retail channels don't make people wait to make purchases. This proposition truly casts a negative light on direct selling. If I run out of skin care or cosmetics, the department stores won't make me wait for 7 days to purchase what I need. If I want to buy a big screen TV, I don't have to wait 7 days while I think about it. 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 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 since February, 2005. Since then, Arbonne has made such a huge impact on my life as well as the lives of countless others. I became involved with Arbonne because the company has an outstanding reputation for phenomenal products and for a business that enables people to grow financially as well as personally. The income I receive from Arbonne has greatly contributed to my family's finances and will allow my husband to retire from his extremely stressful corporate job. Not only have I received substantial financial benefits from my business, I have been able to help others create the lives they want and deserve. Since beginning my business in February of 2005, I have had the honor of developing a team of over 1,500 Independent Consultants throughout the United States and together we are helping our families enjoy better lives.

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,

Shari Weller
Executive National Vice-President, Independent Consultant