

July 13, 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 (\$29), but 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

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will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.



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I have been an Arbonne Independent Consultant for nearly three years. I became a Consultant because I love the products and our family was in need of a second source of potential income. Arbonne has had a huge positive effect on my family's life, as well as the lives of those on my team. Since starting my Arbonne business, I have developed a team of more than 300 Independent Consultants across the country and together we are helping our families enjoy better lives. My family depends greatly on our Arbonne income. We have committed to giving a portion of our income back, through charitable donations, global causes, and contributions to our church. Last year we contributed 16% of our taxable income to charities and our church.

Arbonne has afforded us the means to make a significant difference in others' lives. I also value the personal growth and self-development that have come through my Arbonne business. Arbonne has given me leadership and communication skills, self-confidence, a feeling of genuine caring for others, and a strong desire to help others and give back to society. Arbonne is a company that gives generously: corporately we are donating \$200,000 this year to the Red Cross and Sojourner's; and individually many of Arbonne's leaders are involved in philanthropic causes. That message of generosity and giving back is passed down to us from our company leaders. I am proud to be part of this company.

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. I understand that there are fraudulent groups out there, but the FTC's proposed rule would unfairly target legitimate direct selling businesses, such as Arbonne International.

Thank you for your time and understanding.

Sincerely,

Andrea Langkamer-Smith
Independent Consultant
Executive National Vice President
Arbonne International



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