

ARBONNE
INTERNATIONAL

Jo Anne Nussear
Independent Consultant

July 16, 2006

Federal Trade Commission
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 independent consultant for Arbonne International, I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell the premium Arbonne pure, safe and beneficial products.

I have been an Arbonne Independent Consultant for 1-1/2 years. I joined Arbonne because I believe the products were exceptional and I wanted to share them with everyone I know while creating an additional income source. I am a single homeowner trying to make ends meet in the Washington, DC suburbs.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new consultant as our sign-up fee is only \$29.00 and they are not required to buy anything. People buy other items that cost much more and they are not required to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. Also, I will be required to keep very detailed records in order to share them with prospective new consultants when I first speak to them about joining Arbonne.

I applaud the FTC in its mission to protect consumers, but I believe this proposed new rule has many unanticipated consequences and there are less burdensome alternatives available to achieving your goals.

I appreciate your time in considering my comments.

Respectfully,

Jo Anne Nussear
Arbonne Independent Consultant