

Mona Renouf

July 17, 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

<https://secure.commentworks.com/ftc-bizopNPR/>

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.

I have been an Arbonne Independent Consultant for one year. I became a Consultant because I loved the products, as I have shared the products over the year, I have been able to build a successful business. While doing so, I've seen many people on my team, building the same successes in their life. In the future, myself and those on my team will have achieved a financial status that we could never have reached while working a typical (9 to 5) job. And the great thing about our company is, even if you choose NOT to share the products to create an income, you can choose to just be a discount-consumer of the products for a minimal fee of only \$29.

I am from California, which has many opportunities to create large incomes and financial security; however, it is difficult to achieve this in the mainstream job marketplace. I am currently a housewife, and love that I can work my business from home, while helping others do the same. The products and opportunity we have to offer are incredible. What I enjoy most about our opportunity is that it creates a better lifestyle for so many families, and is also great for our economy. People are taking this opportunity to build a great income, get out of debt, prevent bankruptcy, eliminate the option of welfare and also create a comfortable retirement. My husband has been a business owner in the welding supply business for 11 years now, and although we have a nice lifestyle, we have debt and if we relied solely on his income, we would not be able to retire in a lifestyle that we are used to. In addition, he would have to work well beyond retirement years and as we know, most people are being forced to retire early due to economics or poor health. So, as you can see, there are wonderful advantages in many areas, to many people/organizations through Arbonne International.

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 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 must 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 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,

Misty Whitfield

Executive National Vice President,
Independent Consultant