

Carol Morgan
Jafra Cosmetics

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 a Jafra Cosmetics, Int'l. consultant. 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 Jafra products.

I have been with Jafra as a consultant for the past 8 years. Originally, I became a consultant in my company because I felt the products were exceptional and I wanted to earn some additional income and I didn't want to wait. I knew an exceptional opportunity as well as product and I didn't need 7 days to make that decision. Now, I love the products and the company and how it can help women and men grown personally, professionally and financially.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new consultants. Jafra's sales kit only costs \$50.00. For that \$50.00, the new consultant receives over \$300 worth of products. One of the products, Royal Jelly Milk Balm Moisture Lotion sells for \$65.00 so the new consultant has already made her initial investment back. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. Or, this waiting period may suggest to a new consultant, that they don't know their own mind. Jafra also has a rescission period. Under this waiting period requirement, it will hinder the new person from doing what they want to do. Jafra is a 50 year old company with outstanding records. There is no need to buy inventory and money can be earned immediately. Are you going to stand in the way of people earning money when they need to? When a person gets a job, they get a paycheck. There is no waiting period for them to start.

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. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose any lawsuits. I don't see where Macy's, Wal-Mart or any store reveals its lawsuits when a person wants to shop in their store. Today, with people being sue happy, this proposed rule is totally unfair and unrealistic and is potentially damaging to the network marketing industry.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. This totally invades the privacy of the public. Would

you want your name revealed because you bought products from Macy's, Dillards, Publix, Juice Plus, Melaleuca, or any other business. Shouldn't that be an individual choice?

People have freedom of choice. The decision to go immediately into a network marketing business and making money immediately, should be an individual one. People move here to America so they can have freedom; don't take that freedom away.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

Carol Morgan