

Janice Schouw
Fashion Coordinator
Weekenders USA, Inc.

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Dear Sir or Madam:

I am writing this letter recently I learned about and I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing with Weekenders USA, Inc. as a Fashion Coordinator. I understand that the FTC's responsibility 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 our women's clothing line.

I have been a Fashion Coordinator with Weekenders for more than 12 years. Originally, I became a Fashion Coordinator in my company because 1) I was laid off from my electronics job and 2) I felt the products were wonderful and 3) I needed to earn an income. Now, I am a single woman and I've had to support myself with my business. I am now a woman of 62 years and finding a position in the business world that pays what I was previously paid; or what I've been able to earn with my Weekenders business would be extremely difficult. I can choose my hours and how much I need or want to earn, legitimately.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll a new coordinator. A woman can join Weekenders for as little as \$100 wholesale or she can choose to purchase a fashion pak (at wholesale) for \$320 to \$1,100. The choice of investment is entirely up to the potential new coordinator. 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. I think this seven-day waiting period is unnecessary, because Weekenders USA, Inc. already has a 90% buyback policy for all products including fashion paks purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Weekenders and will then need to send in many reports to my company headquarters.

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 these lawsuits unless Weekenders is found guilty. Otherwise, Weekenders and I are put at an unfair advantage even though Weekenders has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Weekenders headquarters and then wait for the list.

I think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned

about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met. I meet my new clients through established clients. There is a tremendous comfort level for me and my clients when I am introduced to a new person. Why, because I trust my clients and they trust me. In the over 12 years in my business, I have never received a bounced check. I've always strived to service my customers to the best of my ability. Many of the women I have as clients, I consider a friend.

In addition, the women I've sponsored into the business more than likely are clients. We've already established a relationship, and I've been more than happy to "give back" to my new coordinator the clients she has introduced me to. This business is really about building relationships and working together to achieve our personal and collective goals. I've found it very rewarding personally and financially.

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. The whole structure implies that direct selling representatives are somehow "dishonest".

Thank you for your time in considering my comments.

Respectfully,

Janice Schouw
Fashion Consultant
Weekender's USA, Inc.