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February 8, 2008

Deborah Platt Majoras  
Chairman  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Pamela Jones Harbour  
Commissioner  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Jon Leibowitz  
Commissioner  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

William E. Kovacic  
Commissioner  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

J. Thomas Rosch  
Commissioner  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Commissioners:

I am writing in regard to the proposed "Business Opportunity Rule" (BOR) published by the FTC on April 12, 2006. It is my understanding that you may be considering advancing a new proposed regulation in place of the BOR. On behalf of Tupperware Brands Corporation and its more than 180,000 independent contractor sales consultants in the United States, I urge you to take into account the concerns that have been raised about the impact the proposed BOR would have on legitimate businesses and vital income-earning opportunities.

While we fully support the efforts of the FTC to crack down on fraudulent business opportunity sellers, we believe the 2006 proposed BOR would significantly impede legitimate direct-selling opportunities, such as those offered by Tupperware. Our concerns with the proposed BOR were articulated in testimony (enclosed) we presented in November 2007 to the House Small Business Committee, which called us to testify on the impact the BOR on small businesses – that is, our individual sales consultants – and the Initial Regulatory Flexibility Analysis undertaken in connection with the BOR.

We believe the stated objectives of the BOR can be achieved without frustrating the valuable income-earning opportunities offered individual sales consultants by legitimate companies like Tupperware. In the spirit of constructive criticism, we suggested workable alternatives in our comments on the regulations and are continuing to consider options in that regard. The FTC staff has had the mammoth task of reviewing the thousands of comments submitted in response to the BOR, and we applaud their diligence and professionalism in considering this input and exploring alternative approaches.

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We are hopeful that new proposed regulations, in light of this input, will reflect fundamental changes to the BOR. We look forward to the opportunity to comment on the new regulations, and we would be pleased to offer any assistance we can as you move forward in your efforts.

Sincerely,

Thomas M. Roehl

FEDERAL TRADE COMMISSION  
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**FEB 08 2008**

COMMISSIONER LEIBOWITZ