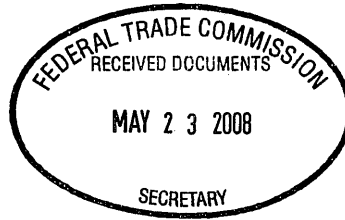




Shaklee Corporation

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Marjorie L. Fine

Executive Vice President
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Via Federal Express

May 22, 2008

Mr. Donald S. Clark
Secretary
Federal Trade Commission
Room H-135 (Annex S)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Business Opportunity Rule, R511993

Dear Secretary Clark:

Shaklee Corporation would like to express its appreciation to the Federal Trade Commission for its careful consideration of the comments submitted by Shaklee and those of thousands of direct sellers in response to the April 2006 Notice of Proposed Rulemaking. We believe the Revised Notice of Proposed Rulemaking ("RNPR") regarding Business Opportunities issued in March 2008 appropriately balances protecting the public from unfair and deceptive business practices, a goal we fully support, and placing undue burdens on the direct selling industry.

Shaklee is familiar with the comments submitted to the Commission by the Direct Selling Association, of which Shaklee is a member. These comments propose useful clarifications to the RNPR respecting the definition of "business opportunity." Shaklee fully supports and joins in these comments.

Shaklee Corporation

Donald S. Clark

May 22, 2008

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We hope that the Commission will consider the Direct Selling Association's comments in the collaborative spirit in which they are offered as the Commission works to finalize the revised business opportunity rule.

Thank you for your time and attention to this matter.

Marjorie L. Fine

MLF/ams