

Filing a Challenge with the Direct Selling Self-Regulatory Council

(DSSRC)

- Any person or entity may submit to DSSRC any matter regarding national direct selling advertising (including direct selling media posts disseminated by direct selling companies and/or their salesforce members) it believes worthy of DSSRC's review.
- All challenge requests should be submitted in both hard copy and in electronic format and should be no longer than eight (8) double-spaced typewritten pages.
- DSSRC encourages all persons or entities filing challenges to include a print copy, screen shot, website URL, videotape and/or transcript of the national direct selling advertisement or the direct selling social media post that is the subject of the challenge.
- All challenges submitted by, or on behalf of, a company that is not a member of the Direct Selling Association (DSA) shall be filed together with a check, made payable to the Council of Better Business Bureaus, Inc. (CBBB) in the amount of \$10,000, as a filing fee to defray some of the administrative costs associated with the advertising challenge process. All challenges submitted by, or on behalf of, DSA member companies shall be filed together with a check, made payable to the CBBB in the amount of \$5,000.
- All hard copy submissions should be addressed to the Direct Selling Self-Regulatory Council, 112 Madison Avenue, 3rd floor, New York, NY 10016. Electronic submission may be sent directly to Peter C. Marinello at pmarinello@council.bbb.org
- Either the Executive President or the CEO of the CBBB shall have the discretion to waive the fee for any challenger who can demonstrate economic hardship.
- If a challenge is administratively closed, the filing fee will be reduced to \$5,000 for non-DSA member companies and \$2,500 for DSA member companies. The difference between these administrative closing fees and the initial filing fee will be refunded to the challenger. DSSRC may, in its discretion, decrease or eliminate the amount refunded to a challenger when DSSRC has expended an inordinate amount of resources on an administratively closed challenge.
- DSSRC encourages those persons or entities filing challenges to limit any and all arguments to the primary or core **product claim(s)** and/or core **earnings claim(s)** in the national direct selling advertising (disseminated by direct selling companies and their salesforce members). The person or entity filing the challenge may, but is not required to, submit supporting data with the challenge.
- DSSRC reserves the right to refuse to open or to continue to handle a challenge when a person or entity filing an challenge publicizes, or otherwise announces, to parties other than DSSRC and the challenged direct selling company the fact that the advertising will

be, is being, or has been, referred to DSSRC for resolution. The purpose of this right of refusal is to maintain a professional, unbiased atmosphere in which DSCPC can affect a timely and lasting resolution to a challenge in the spirit of furthering voluntary self-regulation of national direct selling advertising and the voluntary cooperation of the parties involved.