

May 16, 2007

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex S)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

To Whom It May Concern:

YourTravelBiz.com ("YTB") is a direct selling corporation with over 133,000 representatives affiliated with our Internet travel agency business. YTB concurs with the Direct Selling Association ("DSA") and industry position regarding the FTC's revised proposed Business Opportunity Rule with the following comments:

- We appreciate the FTC's good faith efforts to consider the views of thousands of direct sellers and concur with the FTC's conclusion that revisions to the originally proposed rule were necessary to exempt legitimate direct sellers from coverage.
- As a direct selling company and member of the Direct Selling Association, YTB recognizes and supports the FTC's important consumer protection role and shares the commitment to protecting the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as ours.
- We respectfully suggest that the "required payment" element of the proposed revised rule be modified to exclude payments for the purchase of reasonable amounts of inventory, not for profit materials, supplies, and equipment (business kits).
- We at YTB fully concur with the comments and suggestions submitted to the FTC by the Direct Selling Association, and trust that these helpful recommendations will be incorporated as the FTC works to perfect, clarify, and implement the improved and revised business opportunity rule.

Thank you for your efforts to protect the general public, as well as business such as ours.

Sincerely,