

June 28, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

We are very concerned about the proposed new business opportunity rule R511993 in its present form because it can directly damage Financial Destination Inc. (FDI) and make it very difficult for us to continue our business. FDI was launched on July 4, 2003 with the sole purpose of eliminating financial illiteracy and bringing financial mastery to the nation. This type of education is sorely needed in America today.

Representatives (now over 18,000) live in every state of our nation and our company is on the verge of explosive growth. This is not surprising since so many people are in great debt and have poor credit. Along with basic education about the use of money, debt elimination and credit repair are two of our major services.

The proposed seven (7) day waiting period for new enrollments is not practical and can lead to confusion. Currently without any waiting period, consumers already buy many items that cost far more than our basic enrollment package of \$39.95 and monthly membership of \$59.95. We already have a 10-day money back guarantee, making that waiting period unnecessary.

Rule R511993 wants us to keep very detailed records when an FDI representative first contacts a prospect, and then keep these records for three years! That is both time consuming and burdensome, and it can be very costly. Our company's plan would fall under FTC regulatory authority with the proposed rule since the existing \$500 threshold under the current franchise rule would be eliminated. FDI would then be forced to produce a huge number of documented materials just to comply with this proposed rule.

The proposed rule requires the release of any information regarding prior litigation and civil or criminal legal actions involving misrepresentation, or unfair or deceptive practices, even though the company was found innocent. Today people sue over almost any little thing. We cannot see why it is necessary to disclose these lawsuits unless the company is found guilty. Otherwise, FDI would be at a disadvantage, even though they had done nothing wrong.

Some of your proposed requirements, which deal with gathering information about time-periods, geographic data, and earning claims, will be almost impossible to meet. This information may not be totally accurate or effective in preventing business opportunity fraud.

Because of the great possibility of identity theft, we are not comfortable about giving personal information of prior purchasers to prospective customers, as is proposed. Providing required references could lead to privacy lawsuits, which we would then be required to report. 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.” This could stop many people from joining FDI. People are not willing to freely give out their personal information because of the security issues involved.

We do appreciate the efforts of the FTC to protect consumers. However, many things contained in the proposed rule will result in serious consequences that could easily destroy our FDI business and put people’s personal information at serious risk. There are other alternatives available, which would not be so difficult and destructive to FDI, but could also protect the consumer.

Thank you for taking time to look at our concerns.