To Whom It May Concern:

As Independent Business Owners (IBOs) affiliated with Quixtar, Inc., we would like to express our opinion **AGAINST** the proposed Federal Trade Commission (FTC) proposed rule to ensure than consumers have the information they need to make an informed decision about participating in a direct selling business opportunity.

We have been affiliated with Amway/Quixtar for over 15 years, and believe that our government should protect free enterprise and business owner rights. This proposed rule would hurt our business, which we have built over the past 15 years, and deprive many current and potential business owners associated with our business the opportunity to enjoy the incredible benefit and prosperity that we have been afforded.

We understand that in any business there are ethical and unethical practitioners; however, the role of government is not to punish the majority of honest, hard-working small business owners because of a very small minority of those who take advantage of others.

Your potential ruling would hurt our business in the following ways:

- Prohibition from registering IBOs until 7 days after receiving a disclosure statement: The most excited time after we show a potential IBO the sales and business plan is within 24 hours – after that time, the IBO excitement is substantially diminished and may even result in non-registration.

  If a waiting period is required, 24 hours would be much more reasonable, as that is the time period when we follow up after showing the business plan and answer questions. Seven days is so long that a potential IBO would not even remember their questions or specific information presented in the sales and marketing plan.

- List all legal allegations against Quixtar and its IBO from the past 10 years: This proposed rule would result in misleading potential IBOs, as there is no way to share the complete story behind each and very allegation – that is why businesses are judged in a court of law, not by allegations that may have no merit.

  If disclosure of legal allegations is required, require the business plant to include reference to an FTC-approved website to potential IBOs that fairly presents both sides of the significant and serious legal allegations as well as legal resolutions.

- Require IBOs to calculate and make different disclosures for every income claim: We already provide disclosure through the FTC-approved sales and marketing presentation that is required for a prospective IBO to acknowledge receipt of prior to registration.

  If this is required, make sure the current sales and marketing plan is expanded to include disclosure of other types of income (e.g., income from business support materials, speaking, and meeting attendance) that are made from leaders within the business team. Many of the allegations against our business result in non-disclosure of these income sources through information gained from the Internet or former IBOs.

- Require that every prospect receive “substantiation: for every income claim. The sales and marketing plan includes substantiation for income gained through the sales plan.

  Expand the sales and marketing plat to include average incomes at various levels of the business, including income from sales and other sources such as business materials, speaking, and meeting attendance.

In conclusion, we agree that each potential IBO should receive simple, standardized income disclosures and that all IBOs should have a reasonable cancellation policy.

However, we believe that

- It is an invasion of privacy to disclose personal financial records (which could be mis-used).
- Disclosure of past litigation is very misleading and provides misinformation.
- The 7 day waiting period should not be required, as it is not required in any other business (insurance, banking, etc.) and would be discrimination against our business.

Thank you for hearing our voice.

Michael and Laurie Jacobvitz
Quixtar Independent Business Owners