

July 16, 2006

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

RE: Business Opportunity Rule, R511993

To Whom It May Concern:

I became an independent distributor for XanGo LLC early this year. This came as a result of my using the product, as well as meeting others who use it gaining wonderful health benefits from it. I am a 50+ year old widow who had been searching for a new career since the death of my husband in 1999. I returned to college to pursue an education in a field that I not only loved but could provide me a career with financial security. Before completing that degree I came across the wonderful direct selling business opportunity with XanGo LLC. This business model attracted me because of its ease of entry, low overhead and simplicity. I could operate out of my own home and work as much or as little as my other commitments would allow.

In the changing U.S. economy I could see that this type of business model was the wave of the future. It lets me be the entrepreneur in charge of building my own dreams but with the security of being part of a large team to take advantage of economies of scale for product development and production, marketing tools and distribution. XanGo LLC benefits by having an enthusiastic sales network, but more importantly, the consumer benefits by having direct contact with someone well educated about the product and who actually uses it. We are able to pay a lower price for our product since we are able to keep the cost of distribution lower with this business model. It is a Win-Win situation for all concerned.

I applaud the FTC efforts to protect consumers and for the valuable protections you have provided to both consumers and to business through the years. I am happy you are concerned about the fraudulent groups and scams that many people fall victim to daily. I know that you realize that direct selling companies contribute immensely to the U.S. economy. Many well-known major corporations now operate using this business model such as Amway, Avon, Mary Kay Cosmetics and XanGo LLC. Even Conagra, Dupont and IBM participate in direct sales marketing. The direct sales business model is not synonymous with fraud and scam but is a respected and successfully proven model of operation.

FTC's protections must target the scammers and fraudsters without harming legitimate direct sales companies.

The seven day waiting period proposed in the new rule is unnecessary for several reasons. The first one that comes to mind is that the existing protections in place for "buyers' remorse" already protect someone who signs a contract but changes their mind within a few days of signing it. Secondly, XanGo LLC (as I am sure many other legitimate direct sales companies do) has its own procedures in place to prevent anyone from being hurt financially by the XanGo™ business opportunity. In the case of XanGo LLC, there is an initial purchase guarantee that provides 100% buyback (less shipping costs) for 30 days and you may cancel your contract with XanGo LLC at any time. There are other provisions for returning resalable product within 90 days of purchase.

What I love about my XanGo™ business is the opportunity to be spontaneous and discuss the business opportunity and product benefits to anyone, anywhere, at anytime. I am not burdened by record keeping and administrative nightmares. I am able to help someone start using the product and gaining the health benefits right away without delay. I already provide references to potential customers of people they may know or I know including those who may be near enough to contact or meet with them. The XanGo™ network is large and expanding daily. It is so wonderful that I do not have to try to keep up with knowing the 10 geographically nearest references to every person that I meet. I am able to protect everyone's privacy by sharing references from folks who are open to meeting and sharing their story with others.

The inexpensive thirty-five dollar enrollment fee for a XanGo™ distributorship is not the same as the expensive franchise or other costs associated with some other types of business which may require different types of protections as noted by the existing \$500 business threshold.

I've just barely gotten started with this wonderful opportunity in direct sales and I see myself succeeding and attaining the financial security I desire. I know the FTC wants to protect me and everyone from the harm of fraud and scams. I trust that the FTC will find a way to do that while still keeping all the positive aspects I love about my new business in place.

Sincerely,

Denise Massa  
XanGo™ Independent Distributor