

Dear Federal Trade Commission:

We are retired senior citizens 74 and 73 years of age. We invested 40 years of our lives in youth ministry as an ordained minister and spouse, and continue ministering today as volunteers. We became involved in the direct sales business in 2005 through XanGo LLC of Sandy, UT. Our daughter introduced us to their one product, the mangosteen juice, because she experienced health benefits from it. She wanted us to try it feeling we could possibly experience health benefits as well. We have, and share the results with others encouraging them to simply give it a try. Many have with a vast majority experiencing positive results.

These experiences have resulted in our becoming involved in a direct sales business that provides much needed residual income in our retirement years. It has increased our confidence to be able to meet the financial challenges of our later years in life.

Thank you for the motive you have for your proposed "Business Opportunity Rule R511993," that being to protect consumers from fraudulent business "opportunities," to prohibit unfair or deceptive practices that are common among fraudulent business opportunity sellers. That being sincerely said, we feel this particular rule unfairly targets legitimate direct selling businesses such as (in our case) XanGo LLC. It is our understanding that XanGo LLC hopes to help you find a way to stop fraudulent business opportunities while sparing legitimate ones. It is of utmost importance to us as XanGo distributors that we manage our business with the highest degree of truth and candor. No sale is worth sacrificing our integrity.

This rule would adversely effect our direct sales business greatly in the following ways:

1) The seven day waiting period will certainly inconvenience and "chill" enthusiastic individuals anxious to participate in the XanGo business opportunity. It will also create an air of suspicion among prospective purchasers when told that the FTC requires such a waiting period. This waiting period suggests a level of risk that simply does not exist for XanGo and many other direct selling companies. XanGo requires a very minimal up-front financial investment, and XanGo has a generous buyback policy which presents little or no risk to a prospective purchaser.

2) A list of nearest references with names, addresses and telephone numbers of the ten geographically nearest purchasers is overly burdensome and evokes confidentiality and privacy concerns for all involved. It can further prolong the seven day waiting period. The disclosure of this information can be given to anyone and used for any purpose, and will certainly discourage participation in the direct selling industry. It will not be a significant deterrent to fraud businesses.

3) Without going into detail our business would further be hampered by the earnings claim statement, legal actions and cancellations and refunds.

To pass the "Business Opportunity Rule R511993" would be a great hindrance to the free enterprise system we all cherish here in the United States of America and in particular the small business individuals who are in direct sales. We ask that you do not pass this rule as it now stands.

Thank you for your consideration in this matter.

Respectfully submitted,

John and Delores Venlet