

To Whom It May Concern:

Regarding the proposed rule change that affects network marketing businesses, I humbly request that such proposed changes be completely rejected in its entirety.

Following are the main points I want to make regarding the proposed rule change:

1. I am a Quixtar IBO and I run my business on a part time basis. However, I intend to build this business up enough so that I can run it as a full time career. It's extremely important to me because corporate America has changed so much I have no retirement income. Most of the companies I have worked for have either been sold, become bankrupt or merged.
2. There should not be any waiting period, let alone 7 days. Quixtar has a money back policy if someone is not satisfied. So no one will get hurt. Also, you know what it's like when making a decision in life. You have all the experts telling you either how right or wrong you are. But who are the experts? Are the experts people who do not know Quixtar? When you need medical advice, do you ask an accountant? Will an accountant's advice be accurate medical advice? Also, why 7 days? A person gets only 3 days in being able to cancel financial purchases like a house or an automobile.
3. Eliminate the requirement to provide 10 references in the area seven days before the prospect registers. What do I do if 10 IBOs are not in my area? Why should all the IBOs have their names, addresses, and phone numbers given out? That's private information and I and only I should decide who gets it. What happens after the prospect gets it? What do you do if it winds up in the hands of a telemarketer? Additionally, when that information is given to a prospect, any of those 10 referenced IBOs might sponsor that prospect. So how is it fair to the sponsoring IBO that made the initial contact? As much as one tries to enforce ethics, not everyone will abide by the rules. You would agree that there are unethical lawyers, accountants, doctors, and other professionals' right? This requirement would make it very difficult for anyone to build this business.
4. Eliminate the requirement to disclose past litigation. How does every IBO keep 10 years worth of that information? To give every prospect a copy of all that data including the lawsuits, arbitrations for unfair trade practices, alleged fraud and misrepresentation against Quixtar and IBOs would be so voluminous, what person would actually read it? A person would take one look at the stuff and form an opinion without even reading the actual findings. And what if there were no findings for the plaintiffs? That would be an injustice against Quixtar and the

IBOs. How does one prevent that? Remember, “Perception is Reality”. This requirement makes growing this type of business much harder.

5. Modify the different discloser income claim. Because there are so many products, there are many different income possibilities that could be used to show income generation in a presentation. In a presentation, how do you give a complete picture of all income possibilities when there are thousands of products? It's not practical. A general disclosure statement should be used to cover everything. One that states what an active IBO generally makes on a monthly basis. Again, this makes growing this type of business difficult.
6. To be compelled to provide prospects with personal financial documents to substantiate any income claim should not be required. Yes, the IBO should be able to substantiate the claim but only at the request of the FTC or a state agency. Again, that's private information. It's almost like being audited by the IRS except that here prospects do the auditing. Again this too would adversely affect people in this type of business.

Let me summarize how I feel about this entire FTC proposal. I believe its design makes it so difficult for an ordinary person to start this very simple business that very few people will attempt it. Please, let me be perfectly clear, the proposed regulations, while intended to help, will make it extremely if not impossible for me to build this business to a level where I can fund my retirement. This is my future. The proposed rule should never be implemented in any capacity. As long as multi-level marketing businesses exist and as long as all who enter into such a business start out on the same level as everyone else there should be no problem.