

Dear Federal Trade Commission:

My husband and I became Independent Business Owners in Quixtar in August 2002. Before we registered, we spoke with a number of current Independent Business Owners and heard presentations from at least 2-3 other successful business owners in the St. Paul/Minneapolis, Minnesota area. All our questions were answered immediately and we believe that we made an informed decision to get registered with Quixtar.

We build our business daily around our current full-time jobs. We talk about and sell the Artistry, Nutrilite, and XS Energy/Sports Nutrition products to customers on a regular basis. We have never felt more healthy, more energized, and more excited about life than when we are building our Quixtar business. My husband and I have received financial rewards since our very first month in business and our residual Quixtar income has increased every year.

We have sponsored and mentored over 10 Independent Business Owners on our team. Before anyone is registered, we provide them with information through presentations, CD's, websites, and other successful business owners. We tell them that the Quixtar business opportunity is not a "get rich quick" plan, that hard work is required, and that there are no guarantees of success. We have become life-long friends with these individuals and couples that we have brought into this business and are committed to helping them achieve their goals and dreams for the future. Among those who mentor us and in our local team, we have never seen or heard any dishonest, unethical or illegal activities. Our ultimate goal is to become financially free through this business and to change the lives of 1000's of people through the Quixtar business opportunity.

The following are some of our concerns/comments about how the recent FTC proposed Business Opportunity Rules could affect our business.

First, the requirement of a seven – day waiting period: In most cases, prospects take their time to research the business information we have shared with them. This period of time is usually between 7-10 days. Our concern is regarding how this rule would be enforced?? Dishonest people could easily lie about the date that they first learned about a business opportunity. Though, we believe that most Quixtar business owners would teach ways to support this rule, if put into effect.

Second, the requirement to provide references: 1. We always invite new prospects to meet our local team of business owners. After seeing a presentation, they are given the opportunity to ask questions, to meet others who are building their own Quixtar business, see a variety of careers represented and find out how it is benefiting other business owners. 2. By providing a list of names to a prospect, we will be giving them a chance to register with someone else who didn't have to do the work we did in informing this prospect about the opportunity. 3. After giving a list of names to a prospect, we cannot control how this prospect would use this list of names, i.e. identity theft.

Third, the requirement to provide a “litigation list”: 1. We are not responsible for other business owner’s misrepresentation, fraud, securities law violations, or unfair or deceptive practices. It would not be fair to have to include this list, especially when legal language can be very complicated to understand. 2. As we have stated earlier, most prospects will take a week to get the information they need in order to make a decision. We refer them to reputable sites including, BBB, D & B, and others.

Fourth, the requirement for specific earnings disclosures: 1. When we hand out a Quixtar literature pack to a prospect, it clearly states that the average monthly gross income for an “active” Independent Business Owner is \$115.00. I’m sure other MLM’s do not let their prospects know the average income per active business.

And finally, the requirement for financial substantiation: 1. We always describe the impact the Quixtar business income has made on our lifestyle. 2. It would be inappropriate if we were required to offer prospects the financial records necessary to substantiate our Quixtar income. This is private information for our accountant only and if a prospect cannot trust that what we have stated is true, than they should not get into business with us.

Thank you for this opportunity to respond to the proposed rule. We do not believe that this rule would stop fraudulent business activity. We know that the FTC already has business rules in place for business opportunities. We believe that the FTC’s time and resources would be better spent in enforcing these current rules. We have always been committed to providing Quixtar business owners and prospects with complete and accurate information about our business. So, we will fully support reasonable and responsible rules that will support us as we continue to build successful independent businesses with honesty and integrity.