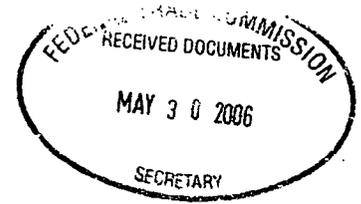


Jane M. Greiner, Ph. D.
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Wellness Consultant-Pharmanex Distributor



May 22, 2006

522418-70182

Federal Trade Commission/Office of the Secretary,
Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir:

I am writing to let you know how much of a handicap the new Business Opportunity Rule R511993 would be if you do not change it from the way it now stands. If you leave in the provisions I am about to mention would be a nuisance at best, and at worst an economic pothole.

Earnings Disclosure: I know from experience how important full disclosure is. New distributors need to study their offers, and as you perhaps know, they can find comparisons on the Internet at "Home-based businesses." However, I am opposed to the 7-day waiting period. That is more time than a new distributor needs. We often need to work fast in today's markets, to be effective. Besides, most distributorships do not cost enough to enter to make the delay cost-effective.

While our company makes detailed earnings statements available, requiring them places an undue burden. Average earnings statements have to be generic, so they are not very helpful to the new distributor. On the other hand, completely detailed statements do not fit the needs of the new distributor, either. Do not saddle a valuable segment of the economy with a wasteful nuisance.

Previous Litigation Disclosure: Given the lawsuit-happy climate in the U.S.A., I believe we should have to disclose only those lawsuits in which the findings were that we were guilty. I am aware that NuSkin, an extremely ethical company, lost millions of dollars as a result of bad press during and following an unethical and wrongful suit. We should not be punished indefinitely for the greed of the person/company that sued. Requiring disclosure of suits in which the company was found innocent is a real time-waster.

Pharmanex

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References: Another part of the rule that I believe will cause real harm is the required listing of the 10 "nearest" purchasers. What does "nearest" mean in this Internet marketplace? It is up to the prospective distributor to ask, if that is important to him or her. Then the company could make the list available. However, if the lists are based on geographic nearness, the relevant uplines would be obscured. People who buy should not have their privacy abridged to provide protection for new distributors. There is always risk when you go into business, and this is not only not necessary, it is an unnecessary nuisance.

Value of Network Marketing: Because so many people face downsizing, we need to return to home-based businesses for them to continue their self-respect in living the American Dream. This makes sense, financially, for individuals, but it also makes sense, economically, for the country. All of us who are network marketers do our part in adding billions of dollars to national prosperity. Please do not unnecessarily over-regulate us.

I have loved my years of being a network marketer, especially for Pharmanex. This business has enabled three generations of our family (Chamberlains) to work together on mutual goals. I hope the Federal Trade Commission will continue to act on behalf of good business and not get lost in bureaucratic over-protection.

Thank you for reading!

Sincerely yours,

Jane M. Greiner, Ph. D.

cc: Senators Geo. Voinovich, Mike DeWine, and Rep. Mike Turner

Cc: Nathan Ricks, Valerie Ward, Dale Anderson, John Chamberlain, and Chris Chamberlain