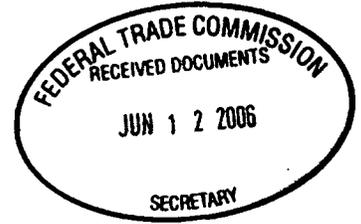


ECOWATER
S Y S T E M S®



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June 6, 2006

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

Reference: Business Opportunity Rule, R511993

Dear Office of the Secretary,

I am writing on behalf of EcoWater Systems to express concern about the application of the FTC's new Business Opportunity Rule. As a manufacturer with over 80 years history, EcoWater supports efforts to protect the consumer from bogus business opportunities. Our concerns regarding this issue arise over the possible application of the FTC's proposal to legitimate dealer-based manufacturers such as EcoWater.

EcoWater is unique because we do not operate as a franchise or charge a franchise fee, nor are we a home-based or multi-level marketing company. We are a manufacturer who sells products through independent dealers with business locations across the country. These independent dealers sell and service products directly to the consumer.

As a matter of business practice, we do not make or speculate earnings opportunities as part of our recruiting efforts. It's our understanding that as a result, we won't be responsible for providing disclosure statements to business prospects however, we might be subject to additional reporting requirements.

It is EcoWater's opinion that applying the FTC's Business Opportunity Rule to independent dealer network organizations, adds an undue burden. Gathering the information will be administratively cumbersome. Additionally, as an industry leading, reputable, long-term manufacturer of high quality products, we have concerns about being "lumped" in with a category of businesses known for less than ethical practices.



A member of The Marmon Group of companies

FTC/Office of Secretary Letter
June 6, 2006
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EcoWater appreciates the opportunity to share our concerns regarding how the new Business Opportunity Rule might be applied and requests that you consider exemption for established manufacturers with dealer distribution.

Sincerely,


Michael Johnson
Director of Dealer Sales
EcoWater Systems
