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David Ings
[redacted]

FEDERAL TRADE COMMISSION
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SECRETARY

June 14, 2006

FTC/ office of the Secretary
R.E.: Business Opportunity Rule R511993

Dear Sir or Madam,

I have run a direct sales business for seven years to complement my income from my work as an engineer. This business has been extremely rewarding because my efforts have tangibly improved other's lives.

I am concerned your proposed Rule R511993 will make it very difficult - if not impossible - to sell Mannatech products. If a person chooses to start their own Mannatech business, it costs only $39. In a day when people can spend a lot more than this any time they want, forcing them to wait seven days creates

an unfair and untrue impression that there is something wrong with our business. Moreover, if a person decides to quit the business within a year, they'll get 90% of their money back. More, the paperwork in tracking every single contact I make and sending it to Mannatech would be a serious, time-consuming, zero productivity investment of precious and limited time, let alone the enormous financial burden on Mannatech to process thousand and tens of thousands of such reports on a daily basis.

In a day and age where lawsuits are frequent and often trivial, being forced to disclose all them unfairly creates the impression of wrong doing even if there were none. Even if nothing was done wrong, Mannatech and I are put at unfair disadvantage.

Lastly, the rule to disclose a minimum of 10 purchasers nearest to the prospective purchaser has all kinds problems:

1) giving out personal information to strangers puts my associates at risk in this age of identity theft
2) the existing business relationships of the references could be damaged if they are working with other companies or competitors.
3) to get the list, I would have to send the prospective purchaser's address to Mannatech and wait for them to send back the list.
4) having to state "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" constitutes, in my mind, a Federally mandated violation of personal privacy. I would be really concerned that my private, personal information is being given out to complete strangers, even without my knowledge

when it is being given out.

I know I benefit from your work, and appreciate your goodwill and efforts on my behalf. However, this proposed rule will create unintended consequences and burdens that could severely hamper my success in this business. I am sure the goals of consumer protection can be achieved in alternate, less burdensome ways.

Sincerely Yours,

[redacted]