



May 16, 2008

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

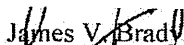
REF: Business Opportunity Rule, R511993

On behalf of the Traders and employees of Phoenix Trading USA, I want to underscore our appreciation and support to the FTC's for the good faith efforts to consider the views of the thousands of direct sellers across the country. We strongly concur with the FTC's conclusion that revisions to the originally proposed rule were necessary to exempt legitimate direct sellers from coverage.

As a direct selling company and pending member of the Direct Selling Association, we recognize and are grateful for the FTC's important consumer protection role. We share the commitment of protecting the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as our own.

We fully concur with the comments and suggestions submitted to the FTC by the Direct Selling Association, and trust that these helpful recommendations will be incorporated as the FTC works to perfect, clarify, and implement the improved and revised business opportunity rule.

We encourage the continued collaboration between the Direct Selling Association and the FTC to protect American consumers while enabling legitimate and ethical business to succeed.


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