



May 27, 2008

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

**Re: Revised Proposed Business Opportunity Rule, R511993**

Dear FTC,

This letter is in regard to the Federal Trade Commission's (FTC) Revised Proposed Business Opportunity Rule, R511993. Southwestern Company appreciates the FTC's good faith efforts to consider the views of thousands of direct sellers and concur with your conclusion that revisions to the originally proposed rule were necessary to exempt legitimate direct sellers from coverage.

As the nation's oldest direct selling company and a leading member of the Direct Selling Association, we recognize and support the FTC's important consumer protection role and share your commitment to protecting the public from unfair and deceptive business practices that *undermine consumer confidence* in legitimate business enterprises such as our own.

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

We appreciate your consideration of our company's views and those of the thousands of direct sellers who sell our educational products to families. If you require additional information or have any questions, please do not hesitate to contact me.

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