

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)

Re: Business Opportunity Rule, R511993

600 Pennsylvania Avenue, NW

Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am deeply concerned about the proposed Business Opportunity Rule R511993. I realize that the FTC is well intentioned and wants to protect people from fraudulent businesses. However, I am an Independent Distributor for a highly ethical and legitimate company named XanGo, and the proposed "Rule" will have an extremely detrimental effect on my business.

I started my business a year and a half ago. Prior to that, I had consulted with a financial advisor because I was concerned about the rather meager reserves I had set aside for retirement. The advisor told me unless I made some serious changes, there was a very real possibility that I would outlive my money. One of his suggestions was that I start a business. Quite frankly, I didn't see how that was possible. I already work a full time job which provides me with medical benefits and, just barely, pays my bills. I believed that starting a business would be very, very costly, and there would be no way that I could afford it.

It was at this time that I heard the advertisement about the home based business opportunity available through XanGo. I called for information, and after researching the company and the product, I decided to get involved. It has been one of the best decisions I have made in my life! The product has helped me and countless others, and my business is growing daily! I simply cannot say enough about the integrity of this company and all the wonderful people that I have the privilege of working alongside. We are all working hard to build brighter futures for ourselves and our families. Finally when I look toward retirement, there is a ray of hope. I believe Rule R511993 will destroy all that I have worked so hard to build.

First, I take issue with the "seven day waiting period". In my business, even though the public initiates the contact with us to obtain information, the common mindset of the person calling us is, understandably, one of skepticism. The seven day waiting period is only going to heighten people's skepticism. I see it happen every day at my job. I am a sales assistant for a developer who sells new homes. Before I can give people a brochure about the homes, I am required by the real estate commission to have people sign a disclaimer that was designed to protect the general public from unlawful real estate practices. Yet time and time again, I have seen people walk away without the information they need simply because they become suspicious when presented with the

disclaimer form. I believe the seven day waiting period will have that same negative effect. Not to mention, the difficulties this proposed waiting period creates for me, as a business owner, in keeping detailed records of each contact I make with each person I talk to.

Next, we come to the “list of references”. Please think about this scenario for a moment. When I go to see my doctor, the nurses, when calling me from the waiting room to go into the exam room, are not allowed to call me by my full name. Because of HIPA laws, only first names are used to supposedly protect the patient’s privacy. Now the FTC is telling me they are going to require that, not only my name, but also my address and my phone number be given out to prospective purchasers. If that isn’t an invasion of privacy, I don’t know what is. I have many single women in my organization who would very definitely be upset and, indeed, fearful if their information was being dispensed in this way. It is very probable that I would lose people from my existing organization, not to mention those who will call for information in the future, but turn away out of fear.

As for the “legal actions”, at the very least, the FTC should require that the outcome of all legal actions also be reported. Otherwise, a very misleading representation is being made.

Finally, we come to “cancellations and refunds”. If the FTC truly understood the nature of network marketing, they would realize that reporting cancellations is misleading and cumbersome. I have personally signed up people who later cancelled their distributorship because they lost their job, had personal or family health issues that arose, were victims of hurricane Katrina, etc. None of that has any bearing upon the outstanding business opportunity that is offered by XanGo! Also, because XanGo is an honest and ethical company they already have a refund policy in place and we inform people of that during the initial informational telephone call.

I state all of this simply to illustrate that legitimate companies such as XanGo and its distributors will, very definitely, be negatively impacted by Rule R511993. Fraudulent companies will not be impacted at all. They will simply continue to lie and do business as usual.

I respectfully request, therefore, that the FTC rethink their actions and abandon Rule R511993. It will only hurt the honest, hardworking people that it is supposed to protect.

Sincerely,

Mary E. Viera