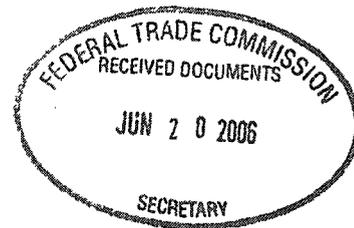


# H. Freeman Seebo Enterprises

[REDACTED]  
[REDACTED]

522418-70107



Wednesday, June 14, 2006

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:

In its present form, the newly proposed rule R511993 causes me concern and alarm. I represent a company named Mannatech, Inc. I do this because:

1. I believe in the products,
2. It adds to my personal income, and
3. The nature of the products is such that they requires personal intervention to educate potential users, so direct selling is important for the public to receive the benefit of these products.

I certainly believe that the FTC's proposed actions are a "good faith" effort to carry out your perceived responsibilities to protect the public from perpetrated fraud. However, please consider that the burdens proposed to be placed upon small businesses such as mine by this rule as proposed portend to be far greater than the intended benefits, and some of its sections could make it virtually impossible for me to sell the Mannatech, Inc. products.

It is my understanding that in the U.S.A., a legal entity (person or company) is deemed "innocent" until proven guilty. The provisions of the new rule seem to place the same burdens upon the innocent as they do upon the guilty, and promise to become so burdensome that they will prevent most, if not all, from being able to make a direct-selling business work. My understanding of the "pursuit of happiness" is the right to try. It promises no one the guarantee of "success." In your efforts to defend U.S. citizens from "failure," as I read the proposed rule, it is more a guarantee of "failure." The collapse of the former Soviet Union was, in my opinion, more than anything else brought about by the elimination of "small business." Why not place heavier penalties upon those proven to be "guilty" than "crippling" those of us who have only "positive service" as our objective.

[REDACTED] [REDACTED] [REDACTED]

Of particular concern is the section of the proposed rule that requires a "seven-day" waiting period before enrolling new customer/distributors. The forced "waiting period" engenders automatic "mistrust," after all, if the Government feels that I can not be trusted, why should anyone trust me. Is this the message that you are attempting to send to the population?

Years ago, when I enlisted in the U.S. Air Force, I did not smoke. However, it was the policy of the Air Force to give "smoke breaks" to "smokers." Those of us that did not smoke were required to "keep working," and later to "police" the discarded butts of the smokers. The message I got from this was, "If the U.S. Government values smoking so highly, my parents who had taught me not to smoke must have been wrong. Surely, the government would not promote something harmful to me, so I took up smoking." Not long thereafter, the U.S. Surgeon General announced the "harmful effects" of smoking. This illustrates the power that you have over the thinking of the average citizen. An action that encourages "distrust" will not be helpful in preventing fraud. It will merely take away opportunity from the average citizen.

Other portions of the proposed rule such as the requirement for "detailed records" will place further burdens upon the ability to begin and sustain a small "direct-selling" business, especially as a "part time" activity.

A grossly unfair proposal is the requirement for disclosure of litigation information. The strength of the U.S. is often quoted as being a "nation of laws." Unfortunately, it would appear that that appellation is no longer appropriate. We have become a nation of "lawyers," and this is making us weaker. Frivolous law suits not only abound, they have become the rule. It seems to me to be an enormous burden to attach to any entity that all litigation be disclosed, whether or not it was won, settled, arbitrated, lost, or is pending. Further, the penalty on the "innocent" is the same as the penalty of the "guilty."

With regard to provision of references: What if, in order to purchase gasoline at your corner service station, the provider were required to provide you with a listing of the contact information for the 10 most recent purchasers? Or, perhaps Sears, K-Mart, Wal-Mart or the local grocery store? An imposed requirement to provide the 10 most recent prior purchasers is another item that will only penalize the honest and force another unconscionable burden upon the industry. And, by forcing this requirement upon the direct seller, and not upon any other retailer, it is certainly a selective attack upon a whole segment of mostly honest,

[REDACTED]