



5/31/06

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

522418-70457

Sherman D. Dunham


Dear Commission:

I am writing to express my concerns over proposed rule R511993. I have been in Network Marketing for more than 10 years, and believe some of the proposed rules are unfair and impose a burden on the Networking industry that other industries are not subjected to.

I do believe there are some reasonable safeguards that would help maintain the integrity of our industry but would not put an unjust burden on distributors to pursue their goals.

Specifically I am concerned about the rule that requires a 7 day waiting period for a new Distributor to join an Organization. We are adults and able to reason and perform our own due diligence in our own timing. Having to wait 7 days is an infringement on our rights to pursue our own needs and goals and assumes we are incapable of making our own reasoned decisions.

I also oppose the rule concerning mandatory disclosure of 10 Business References. This violates privacy. In addition, new distributors just getting started would not have 10 Business references. However if a prospect specifically requests this information, that would be acceptable as well as printing availability on enrollment and disclosure materials.

With regards to the Earnings rule, I am not in favor of this rule requiring a Distributor to provide specific earnings information. No other industry is required to furnish this kind of private information. However I would support a rule requiring a statement of average income earnings.

Thank you for giving my concerns consideration.

Sincerely,


Sherman D Dunham