

July 11, 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:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its presented form, it could prevent me from continuing as a successful MLM distributor and would destroy my small business.

I have worked 14 years in this industry selling nutrition products. This is the sole source of income for my family. I am a very concerned citizen and believe that rule making and all forms of legislation should be absolutely transparent to all our country's citizens whose lives and livelihood depends on the sale and introduction of small business opportunities to others. This I believe, is one of the last means for the average individual to raise him or herself to a position of financial security in our country.

Some of the sections in the proposed rule would make it hard or almost impossible for me to sell my nutritional products and continue to enroll others in a timely fashion.

One of the most difficult sections of the proposed rule is the seven-day waiting period to enroll a new distributor. This waiting period will give the public the idea that there's something wrong with our plan or me. I also think this seven-day waiting period is unnecessary, because Stem Tech Health Technologies already has a 100% buyback policy for all products including sales kits purchased by a salesperson.

People buy TVs, cars and other items that cost much more than \$500 or even \$0 (for example enrolling as a distributor) and they don't have to wait seven-days. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone (prospect) and will then have to send in reports to my company. I am a small home business and these burdens will hurt or possibly even destroy my business. This proposed rule is bad.

The rule concerning disclosure of 10 prior purchasers is totally impractical and irrelevant. Divulging personal information is invasive and can possibly lead to sexual harassment or even identity theft. This would certainly be helpful to scam artists.

The last thing we need is more burdensome government intervention in our lives not to mention the additional expense to all taxpayers to support this type of rulemaking requiring major additional reporting compliance and more paperwork. The Government has already become much to cumbersome in peoples lives.

The FTC 's current franchise rule adequately protects our people from fraudulent business scams not real business opportunities and has done so for over 20 years. **This rule will do nothing to stop crooks.** The new proposed business opportunity rule R511993 is totally unnecessary at this time.

More government intervention will not protect our citizens to any greater degree. Our citizens' common sense and understanding will guide them in making a correct decision when any small business opportunity presents itself. They will more than likely be able to determine and make their own correct financial decision better than any government rule could ever dictate.

Please eliminate the seven-day waiting period, the reporting and record keeping requirements. The buy back policy and seventy-two hour right to recession is already sufficient. The necessity of documenting these standards when the dollar level of enrolling or buying a distributorship is zero, is ludicrous. This proposed new rule is without merit as currently written.

Please eliminate this proposed Business Opportunity Rule R511993 entirely. Our current franchise rule is totally adequate without modification.

Sincerely,

John O'Leary
Independent Distributor

PS: Two hard copies to follow by mail
C/C to DRA
C/C to MLMWatchdog