

Robert Loney
Independent Associate of Youngevity International

Friday, July 14, 2006

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

RE: business Opportunity rule, R11993

Dear Sir or Madam:

As an Independent Network marketer with over 25 years experience, I ask that you do me the honor of a few minutes of your time.

The proposed Business Opportunity Rule, R11993, would have made my humble success over the last 25 years impossible. I've built 3 sales organizations, which has provided my family and I with an income that allowed me to be independent and to be at home with my two young children as they were growing up.

Having little or no capital to start a business, which describes most Americans today, I have been able to enjoy the benefits of owning a successful home-based business.

For ten of those 25 years, I was a single parent raising 2 teenage boys and was able to be fully involved with their lives on a daily and nightly basis. This is a blessing that thousands of parents in our industry enjoy today. And many more thousands would love this as a family lifestyle.

This proposed ruling would destroy our access to the market place. You are obviously concerned about someone taking advantage of someone and that's a good thing, however, you are throwing the baby out with the dirty water (pardon the cliché).

It is common knowledge that word-of-mouth is the most powerful form of advertising. Nothing speaks louder than a satisfied customer. This ruling blunts free speech in a most serious way. You do not require Proctor & Gamble to supply ten Customers names, phone numbers and addresses to every new potential customer. You would not get to first base trying to limit their ability to communicate freely the value they believe they bring to the market place. Why does this bill select the Network Marketing industry to restrict and limit?

Why do you postulate and appear to assume by this very ruling that somehow we in this end of the selling industry have less integrity than anyone else that presents a product for consideration? Most of us in Network Market speak from our own personal experience with a product or service that we've personally found of value.

Do the advertising agencies have the customers interest in mind when they write script or is it the goal to “move product” for the benefit of the retailer? In our industry we are beholden to the consumer in a direct and meaningful way. Without a huge advertising budget we must satisfy the consumer most every time or our business will not grow and it becomes impossible to enjoy long-term success.

I propose to you that the people in this industry who do enjoy long-term success have a higher than average sense of integrity. To build a long-term successful Network Market Career, Customer loyalty reigns supreme. People just do not continue using products and services that do not do what they promise.

There are tens of thousands of very successful Independent Network Marketers who would echo my experience and sense of pride in what we do. Your ruling would make it impossible for most to succeed.

I request that you consider these points and rescind, cancel or make your target more carefully aimed so as to not destroy that which many of us have put a lifetime into.

Respectfully,

Robert Loney
Independent Associate of Youngevity International