

July 15, 2006

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex W)  
600 Pennsylvania Ave., N.W.  
Washington, D.C. 20580

Re: Business Opportunity Rule, R511993

Dear Federal Trade Commissioners,

Thank you for the opportunity to comment on Business Opportunity Rule, R511993. My name is Robert Buisson and I have been a Primerica representative for over thirty years. I have series 6, 26, and 63 securities licenses and I am also licensed to sell life insurance products in a number of states. I am the head of an Office of Supervisory Jurisdiction on the securities laws with significant compliance responsibilities within my Primerica organization.

I joined Primerica when I was 27 years old. At the time I joined Primerica I had been working for a year as a high school junior varsity basketball coach, my first job after graduating from college. My wife was pregnant with our first child and I began searching for an opportunity to increase my income. A long-time friend of mine was working as a part-time Primerica representative and he asked me if I was interested in learning about this business. I purchased a life insurance policy from my friend, but I had no interest at that time of becoming a Primerica representative.

Several months passed and I had gone from job interview to job interview to no avail. Facing the financial demands of a growing family, I knew I had to do something. When my friend contacted me again, I listened to his presentation. The opportunity to manage my own business as a financial professional was attractive to me and, after obtaining my insurance license, I began working immediately as a full-time independent contractor of Primerica.

My decision to join the business was one that changed my life in more positive ways than I could ever have imagined. My family and I are eternally grateful for the financial freedom and opportunity that my Primerica business has allowed us to experience. On a personal level, my Primerica income allowed me to provide round-the-clock care for my sister who had been paralyzed by a stroke. Although she had all the cognitive skills of a normal person, she could only blink her eyes to signal her thoughts. It was a great blessing to me that I had the ability to keep my sister happy and involved in life until her death.

I am not the only one who has benefited from owning a Primerica business. There are over one hundred thousand part- and full-time Primerica representatives who have

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increased their incomes and their ability to provide financially for their families. The ease of entry into the business - \$199 to cover the costs of training, insurance examinations and licensing – allows individuals with modest resources to establish a financial business supported by a well-established subsidiary of Citigroup. As a result, Primerica has one of the most diverse field forces in America. There are no “ceilings” and each Primerica representative has the opportunity to be as successful as his or her talents and drive allow. The public interest is served by the opportunity that Primerica provides to individuals who might not be as successful in more traditional corporate jobs.

The public interest is also greatly served by the financial products that are sold by me and the other Primerica representatives. Our market is mainly lower to middle income America which is underserved with life insurance and investment products. Because of the large number of our part-time representative and the economies of an independent contractor sales force, we are able to help families who otherwise would be unprotected financially. I am proud to say that Primerica has had a significant role in easing the monetary burdens of scores of families affected by the tragedies of 9/11 and Katrina. The success of Primerica in filling this need is shown by the fact that Primerica is one of the largest providers of term life insurance with \$34 billion in face amount outstanding today. Primerica also has \$27 billion in investment assets under management.

As drafted, Business Opportunity Rule, R511993, has the ability to destroy the livelihoods of over one hundred thousand Primerica representatives and deprive thousands of lower and middle income Americans of cost-effective financial products. The financial responsibilities created by the disclosure requirements of the Business Opportunity Rule would add tremendous monetary and time costs that could potentially destroy the businesses of both veteran and beginning Primerica representatives. The administrative costs and logistical burdens of the proposed 7 day rule substantially decrease or eliminate the profit potential for Primerica business owners and would discourage individuals from joining the company.

I now have two of my children involved with Primerica. I want them have the same opportunity that I did to become a successful entrepreneur through Primerica. If R511993 is enacted, I fear that their opportunities will be lost.

Sincerely,

Bobby Buisson