

May 27, 2008

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

Re: Business Opportunity Rule, R511993

As a direct selling company and member of the Direct Selling Association, Univera recognizes and supports the Commission's role in protecting the public from unfair and deceptive business practices.

Univera truly appreciates the Commission's good faith efforts to consider the view of thousands of independent direct sellers to be exempted from the proposed Business Opportunity Rule. As a company, we are committed to high standards and best practices to provide a valuable opportunity for individuals to build a business and obtain financial and personal satisfaction while providing health and wellness products and services to others.

We concur with the comments and suggestions which have been submitted to the Commission by the Direct Selling Association and trust that these helpful recommendations will be incorporated as FTC works to perfect, clarify and implement a final rule.

Sincerely,

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