



Preserving the Promise of Residual Income

WRITTEN COMMENTS ANPR

Business Opportunity Rule, R511993

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

COMMENTS ON REVISION FROM:

The MLM Distributor Rights Association (DRA)

**From: Peter Mingils, President, Marcie Cook, Treasurer,
Rod Cook, Chairman of the Board**

Mailing Address: See: <http://www.thedra.com>

WHAT IS THE MLM DISTRIBUTOR RIGHTS ASSOCIATION?

The Distributor Rights Association is the only Non-Profit (501(c)(6) organization in the MLM-Network Marketing Industry. The DRA represents approximately 1.2 million MLM Distributors through the “downlines” represented. It consists of top leaders down to small distributors in the in the Network Marketing Industry. It was founded because of injustices to MLM distributors by immoral MLM companies who put profits in front of promises of residual income. The DRA promotes communication such as mediation between MLM Distributors and companies in case of disagreements.

A strong part of the Distributor Rights Association’s Charter (See www.thedra.com) is to fight scams and pyramid schemes that hurt good innocent prospects for MLM opportunities. We consistently see unethical people lure innocent prospects away from good (money back guarantee) opportunities offered by our Distributors we represent.

The MLM DRA since its membership was founded to protect Independent Contractor MLM Distributors is daily made aware of scams. Unlike other organizations and their comments the DRA membership is “down on the ground” where the battle between good MLM Distributors and “con artists” fight it out on a daily basis.

The following comments are submitted 5/23/08:

COMMENT 1: The Revised Proposal does less to damage the individual marketers in the MLM industry and has received tentative approval from our membership. Due to the fact the Revised Proposal is written in a narrative format we reserve the right of final approval until the final written rule is formatted as it will be implemented.

COMMENT 2: If the revised proposed Business Opportunity Rule does not follow the narrative intent as presented in RIN 3084-AB04 the DRA demands **FORMAL HEARINGS** on the proposed Business Opportunity Rule, and will consider an Informal Conference a violation of our Constitutional Rights in accordance with our demand letter previously submitted.

Peter Mingils
President
MLM Distributor Rights Association

Marcie Cook
Treasurer
MLM Distributor Rights Association

Rod Cook
Chairman
MLM Distributor Rights Association