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July 14th, 2008

Mr. Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Avenue, Room H-135
N.W. Washington, D.C. 20580

Re: Rebuttal to comments 535221-00114 submitted by Steven Rotolante.

Dear Secretary Clark:

Steven Rotolante is not being entirely forthcoming in his commentary. Mr. Rotolante, by his own admission, has a "family member" he is at odds with who is a Usana distributor. He has otherwise had no personally experience with any MLM company. Mr. Rotolante was also a contributor to the anti-Usana report published by ex-felon Barry Minkow in March of 2007 (Usana has sued Minkow for stock manipulation – Minkow was short Usana stock when his report was published, which netted him \$61,000, in addition to the \$200,000 he was paid by another ex-felon who was short the stock, and two hedge fund managers). Mr. Rotolante is also an avid Usana basher in their financial board at Yahoo!, where he has hit them in over 1,600 posts to date (using the confirmed screen names "rampageSR" and then "terminatedramp" after Yahoo! terminated his first account). Over 80% of these attack posts have occurred since Minkow's report was published 16 months ago.

As can be seen here, Rotolante, like Robert FitzPatrick, also believes the FTC is taking no action against Usana, nor any MLM company, due to conspiracies and financial influence:

<http://tinyurl.com/6capef>

Please note that all of the allegedly undisclosed income data that Rotolante cites in his rebuttal is derived entirely from Usana's detailed associate commission data that is provided to every distributor. Also, much of the same data, such as average earnings-per-rep, is easily discernable from Usana's (USNA) 10-Qs & 10-Ks (the SEC recently closed an investigation of Usana, due to Minkow's, and in part Rotolante's, allegations, and took no action of any kind).

Several attempts have been made to constructively debate Mr. Rotolante online, and I personally have challenged him numerous times to a moderated, professional debate of the very same issues he cites in his rebuttal comments, and he has declined on every occasion.

The points by which Mr. Rotolante attempts to condemn Usana and all MLM companies, and by which he asked you to do likewise, is legally, mathematically, logically, and verifiably incorrect, and should be given no weight or credibility.

Thank you for your consideration.

Len Clements (court certified multilevel marketing expert)
Founder & CEO
MarketWave Inc.

Disclaimers: 1) MarketWave, Inc. is not an MLM company, nor am I a distributor for, or employed by, any MLM company; 2) All facts cited in this rebuttal are sourced and verified.