

Iris Castillo

June 12,2006

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

Dear Sir/Madam:

I am addressing this letter to you because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a direct selling consultant/distributor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," and we thank you for that, however some of the sections in the proposed rule will make it difficult if not impossible for me to sell Mannatech's Glyconutrient products.

One of the most confusing and troublesome sections of the proposed rule is the seven-day waiting period to enroll new distributors/consultants. Mannatech's Optimal Health Plan cost only approximately \$170.00 a month. People buy much more expensive products such as TV's cars and they don't have to wait seven days. This seven day waiting period might give the impression there is something wrong with the plan. I also believe this seven day waiting period is unnecessary because Mannatech already has a 90 % buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this new waiting period, I will need to keep detailed records when I first speak to someone about Mannatech's Glyconutritionals and will then have to send in many reports to Mannatech's corporate headquarters. I urge you to reconsider this proposal in its present form.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech Company is found guilty. Otherwise, Mannatech and I are put at an unfair disadvantage even though Mannatech has done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of the individuals (without their prior approval) to strangers. In addition, giving away this information could damage the business relationship of the references that may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to

Mannatech headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson “If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers.” People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been affiliated with Mannatech Glyconutritionals a global wellness solution company and ingesting their products for 1.5 years. I can honestly tell you that Mannatech Inc. with their products truly have the missing link to feeling healthy and well. I became involved with the company not for the money but for its glyconutrient products. I now want to make sure that people all over the world are aware that this new technology is available for each and everyone of them regardless of whether they can afford them or not. I have had such great results from glyconutrients that in my opinion humanity would be greatly harmed from not promoting glyconutrients. I feel so strongly about what this new technology can do for peoples health and wellness that everyone that I care about that is close to me is on Mannatech’s Glyconutrient technology.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goal.

Thank you for your time in considering these comments.

Sincerely,

Iris Castillo