

Dr. Neechie Moore
Let's Celebrate, International

June 9, 2006

Federal Trade Commission/Office of the Secretary, Room H-135, Annex W
Re: Business Opportunity Rule, R-511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R-511993

Dear Sir or Madam:

I am writing to let you know that I am very concerned about the proposed Business Opportunity Rule, R-511993. I believe that, in its present form, it could prevent me from continuing as a consultant in direct sales. I believe that some of the sections in this proposed rule will make it very difficult for me to continue in direct sales of Mannatech nutritional products.

One of the most confusing section of the proposed rule is the seven day waiting period to enroll new consultants and/or distributors. Mannatech's sales kit costs less than \$1,000. People purchase cars, TVs and furniture that costs more than this and they do not have to wait seven days. This waiting period gives the impression that there may be something wrong with the plan. I feel that the seven day waiting period is unnecessary in that our direct sales company already has a 90% buy back policy for all products, including sales kits purchased by a salesperson within the last 12 months. Under the proposed waiting period requirement, I will need to keep very detailed records about when I speak to someone about Mannatech products, and will then have to send in my reports to Mannatech, Inc. Headquarters.

This proposed rule also would make it necessary for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices ... regardless if the company were to be found innocent of such charges. Today, anyone can be sued for almost anything. Why would I have to disclose these lawsuits unless Mannatech were found guilty? Otherwise, Mannatech and I are put at an unfair advantage even though Mannatech has done NOTHING wrong!

Finally, the proposed rule requires the disclosure of a minimum of ten (10) prior purchasers nearest to the prospective purchaser. I am always

glad to provide references but I am very uncomfortable giving out the personal information of individuals without their approval to strangers. This would pose a great potential risk for identity theft. In order to get the list of the ten (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 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 a Mannatech, Inc. consultant and distributor for more than 10 years. Originally, I became a Mannatech sales representative because I liked the products and wanted to earn an extra income. Now, my family and I depend exclusively on this source of income to support our budget.

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 in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

Dr. Neechie Moore

NM/dm