

June 15, 2006

Dear Sir or Madam:

I am strongly opposed to Business Opportunity Rule R511993. It could prevent me from continuing as a distributor/affiliate with Nikken. I have been an independent Distributor for over ten years now, and I am very satisfied with my company's legitimacy and integrity.

I do not have many options except to work from home. Nikken is the most viable and honest business I have ever worked. This 7 day waiting period will give the public the idea that there's something wrong with me or my company. My company already offers a 3-day right of rescission to the consumer. That is the same as buying or refinancing a home, which is more than adequate.

The entry cost to my company is only \$49.00 and that covers product/service costs for Nikken to set up the new Independent Distributor. People buy TVs, cars, and other items that cost much more than \$49.00 and they don't have to wait 7 days. The record keeping alone would be insurmountable. I am a single home based business owner and this burden would force me to hire outside help, for which I do not have the financial means. This proposed rule is overwhelming and frightening.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the purchaser. To me, this is definitely a violation of privacy to a complete stranger, not to mention identity theft, and/or racial discrimination. I am very uncomfortable giving out the personal information of individuals (without their approval) to perfect strangers I may contact on the Internet. I would certainly never give them mine!

In conclusion, I firmly believe this rule will do nothing to stop scam artists! Scam artists hurt my business too! I am a good American citizen and I am only trying to make an honest living! Thank you and please help me keep my business.

Sincerely,

James C. Brodock