

FROM:
Al and Millie Bolton
Independent XanGo™ Distributors

TO:
FTC, Office of Sec'y, Room H-135 (Annex W)
600 Pennsylvania Ave NW
Washington, DC 20580

RE: Business Opportunity Rule R511993

To Whom It May Concern:

I am writing this letter due to my concern about the proposed Business Opportunity Rule R511993. I believe that in its present form, would prevent the business I operate from continuing as a XanGo™ Independent Distributor, and would destroy the small business I have just started to build and operate, as well as those of, literally, thousands of others.

I have been operating a home based business, which is being an independent Contractor representing XanGo™ LLC, for just four short months. I contracted to operate this business because my wife and I totally believe in this product, we both personally use this product and love sharing it with others. Some people we have introduced to XanGo™ have elected to become Independent Distributors for XanGo™. Please don't destroy our small businesses, our hopes and our dreams of someday being able to support our families with the income from XanGo™ as our sole source of income.

Some of the sections in the proposed rule, R511993, would make it very difficult for me and many others to sell the XanGo™ product and would almost make it impossible to introduce others to this fantastic opportunity under the proposed rules. Changing to the new rules would stifle the growth and profit potential of the business we operate.

The proposed waiting period will give the public the idea that there is something wrong with me or the XanGo™ business plan and also will reflect badly on me. I believe this seven-day waiting period is unnecessary, because XanGo™ already has a 90% buyback policy for all products including sales kits purchased by a salesperson. Additionally a 100% total money back guarantee, which applies to any new enrollee, is guaranteed for these enrollees and is currently and daily exercised freely by anyone purchasing from XanGo™ within the first 30 day period. The current procedures in place by XanGo™ already insure that no one can ever be hurt financially by the XanGo™ business opportunity.

One of the most difficult sections of the proposed rule is the seven day waiting period to enroll a new distributor. I'm not selling firearms. The procedure associated with the proposed rule change would make it extremely difficult to build and operate a XanGo™ business. This change would strongly curtail initial profit and actually make operating a XanGo™ business less profitable than it currently is under the existing rules and

procedures. For a new rule to stifle profit should point out the lack of thought that has gone into this new rule proposal.

The XanGo™ sales kit only costs \$35.00. People buy TVs, cars, and other items that cost much more than that and they don't have to wait seven days. Under this waiting period requirement, I will need to keep very detailed records when I first speak to a prospect and will then have to send in reports to my company. XanGo™ distributors operate small home businesses and this burden could destroy them completely by requiring excessive paperwork, and requiring a person to be a superstar instead of being just an ordinary person seeking to get ahead. With these new proposed rules, the XanGo™ opportunity would cease to be for the average person and would require one to be an aggressive and capable business person in the beginning. This is exactly the opposite of what the XanGo™ business opportunity was designed to do.

The proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I would be glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Wouldn't we also be violating the Privacy Act, which is a federal offense? Women may be subjected to sexual harassment. Others may be subjected to racial harassment. Unless the FTC passes an addition to this rule prohibiting sexual or racial attacks related to this disclosure, it will open up women to sexual attacks and/or stalking. In the end this rule must bind the FTC to take direct enforcement action on sexual and racial attacks with a special unit assigned to monitor actions related to the disclosure forms.

I do not list my name in the telephone book. I only give out my name and phone number to people I want to. Has anyone ever gone to a business and tried getting a phone number or address of a person? I can't even get the phone number of a person on my bowling league. When I call the league secretary for a number, she will call that person and give them my phone number and will only give them my phone number with my permission.

Since looking for a business that I can operate from home, I have been contacted by over 83 different companies. I selected XanGo™ for my business opportunity. I have also gotten myself educated on what is good and what is bad. If I had known then what I know now, there are a couple of business opportunities that shouldn't be available. Why? They were pyramids. They only recruit more people to recruit more recruiters with no product to offer. These were only a couple of the bad business opportunities presented to me. I know that there has to be more. These businesses will continue to operate, with or without Rule 511993. They might get caught by the Attorney General's office, but until they do get caught, they will continue giving legitimate companies, like XanGo™ a bad name because Rule 511993 will lump the good companies with the bad. Please do not lump great companies like XanGo™, which has a 100% money back 30 day guarantee, into the same group as those who currently take advantage of others daily, with no repercussions.

Just one other thought. When I worked as a truck mechanic, the company I worked for wanted everything in the computer and they made the comment, "In three years we will

be a paperless operation". I worked for that company for another four years and all I got to see was five times the paperwork. I think that they started out trying to save a tree and ended up killing a forest. Are we headed down the same road with this new FTC ruling?

Please rethink the new Rule 511993, work at getting rid of the bad guys, and maybe we can save the forest.

Most respectfully,

Alfred Bolton and Millie B. Bolton