

Sally Hilliard
"It's Life Changing!"

June 26, 2006

Federal Trade Commission
Office of the Secretary

Re: Business Opportunity Rule, R511993

Gentlemen:

I am writing this letter to let you know how the passing of this rule will affect my livelihood. I am a senior citizen, retired and widowed. I rely on my income from my MLM business to allow me the freedom to travel and enjoy life.

As a little background, I have been involved with over 10 different MLM businesses for the past twenty years. Some good, some not so good. For the past 18 months I have been involved with XanGo selling their functional health beverage. I love the MLM environment. Some of my closest friends and relationships have come from working in the MLM business. The people I've met thru this industry are supportive and caring individuals. The business has made me a better communicator and a better relationship-builder.

MLM has allowed me to work both from my home and on the road when I'm traveling. I love to travel and this business is the only one I can find that will allow me to earn an income without being at home. I fear this new rule will eliminate that opportunity because of two different provisions in the proposed rule. The first is the seven-day waiting period. The second is the 10 nearest existing sales people.

The seven-day waiting period provision means that I cannot travel as freely as I have been able to in the past. I will have to stay in one place long enough for a potential customer to wait the seven days before completing the sale. In addition to restricting my travels, it also requires additional recordkeeping that is burdensome. It also has a negative connotation to it casting a shadow on the business in general. I am very proud of the company that I represent and of the way that I conduct business and I don't like putting unfounded negative thoughts into my customers' heads.

The "10 nearest existing sales people" provision also puts a huge strain on my ability to travel. I am often at an RV Rally where I truly have no idea where my

customer's primary place of residence is. I'm not sure how I could overcome this obstacle. I also do some of my selling via the Internet and my website. How would I be able to come up with the "10 nearest existing sales people" there?

I believe the ability to comply with the earnings claims provision will be difficult. I have always been extremely careful not to make any projections about earnings in my dealings with potential customers. It's simply not good business. I'm sure this portion of the ruling is directed toward those that abuse this point and, unfortunately, those individuals will find a way around it anyway and it will not produce the desired result.

I am disappointed at the wording of the "litigation reporting" area of this proposed law. I believe anyone interested in gaining insight about a specific MLM company should have access to as much information as possible. I do not believe that the wording of this section spells out a clear and concise picture of a company's past history because it doesn't distinguish between winning and losing lawsuits.

In the overall picture, I am pleased to see that the FTC is working towards putting some safe-guards in place to protect the consumer from illegal "pyramid scams". They are definitely out there. I just worry that some of the areas of this new law will also weed out some of the best MLM'ers in the business because of these new restrictions. That would be a shame and I believe it unfairly targets legitimate direct selling companies.

Thank you for considering my letter.

Sally Hilliard