

Gary Roush

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

Subject: **Business Opportunity Rule R511993**

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed **Business Opportunity Rule R511993**. I believe that in its presented form, it could prevent me from continuing as a Distributor for Xooma Worldwide and other companies I work with and destroy my small business workings. This would be devastating as I enjoy working the business and watching it grow. Making it harder for me to grow the business will make it harder to teach the distributors that want to work with me because of this rule making workings of the business too cumbersome.

I have been an independent Contractor Distributor for Xooma Worldwide for almost a year now and seeing good results and a group of very satisfied users and marketers. A good product is always shared by word of mouth.

Originally, I started my Network Marketing because of the products I loved them and wanted to earn some additional money. Now my family depends on this extra income to supplement our budget. Please don't destroy my small business as we need it! Isn't the government supposed to encourage good business? I would think so and this rule is taking this good business away.

Some of the sections in the proposed rule would make it hard or almost impossible for me to sell my Xooma Worldwide products.

This waiting period will give the public the idea that there's something wrong with me or our plan and also reflects badly on me. I also think this seven-day waiting period is unnecessary, because Xooma Worldwide already has a 100% risk free policy where a person can send back the product and get money back 100%.

One of the most difficult sections of the proposed rule is the seven day waiting period to enroll a new Distributor into Xooma. Why are we the good people being tortured with harder business rules? This will surely drive business down, not up. Go after the crooks themselves personally, not the good guys. The crooks will do whatever they want not following the rules while we who follow the rules suffer for what they do.

Xooma's does not require a sales kit and the front-end product arrives within days. 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 someone a prospect and will then have to send in reports to my company. I am a small home business and this burden will hurt or destroy my business. This proposed rule is bad and very

cumbersome. Whatever happened to the freedom of a business person running a business? Successful business owners succeed because they had the flexibility to make it work. This rule will take away this incentive.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior 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 individuals (without their approval) to strangers. Women who are in my organization may be subject to sexual or racial harassment so this part can't go in at all, unless the FTC passes an addition to this rule Prohibiting sexual or racial attacks related to this disclosure. In the end the 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. And worst is that most distributors only on the average share the product and enroll three to their group and learn to use the power of leveraging. To require 10 prior purchasers is impossible for most all distributors and this will surely discourage new customers from being potential distributors.

I have seen many scams on the Internet and been approached by many crooks because of my success. This rule will do nothing to stop them. They hurt my business! This rule will not stop Crooks – they violate the current rule all the time. But I am a good American citizen and this proposed set of rules will hurt me. Thank you and please help me.

Sincerely,

Gary Roush