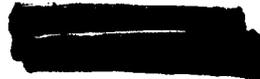
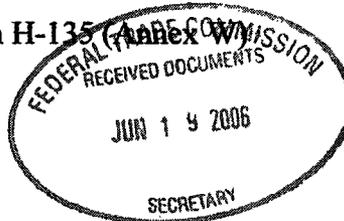


522418-70126

June 10, 2006
Linda Bruno



Federal Trade Commission/Office of the Secretary, Room H-135
600 Pennsylvania Avenue, NW
Washington, DC 20580
Re: Business Opportunity Rule, R511993



Dear Sir of Madam:

Several years ago I was having many health challenges and had been to the doctor every 1-2 weeks for over a year. I reacted to all medications and was unable to stop the downward spiral. A friend visited and I shared my concern. She invited me to dinner and a nutritional talk a couple of hours away. I learned of some previously unknown missing micro-(glyco-) nutrients in our diet which allow the cells to send proper messages to other cells directing them to feed, cleanse, regulate and repair the individual cells of the body. These glyconutrients are so important, that, all other things (food, supplements, and drugs) that enter the body, are directed by the cells to be used so the body will function as designed. This information was based on much research and by adding these nutrients, it would help my body get back to stability. I was tired of being sick , and all I desired was to begin to support my body, as soon as possible. If someone had told me that I had to be in a business to get these missing supplemental food nutrients, I would have immediately run the other way!

I have always tried to see both sides of an issue to help bring about fairness and understanding to both sides. This brings me to the proposed Business Opportunity Rule, R511993, in its present form. Under the proposed rules, I would not have gone 7 years without asthma or allergies, and all the other problems would not have cleared up. As I see it, the way parts of this rule are written, much of the concern you have for protecting the buyer does not make sense for the "seller". I hope my example will help you see it from my point of view.

When I began with Mannatech seven years ago, it was for improving my health. I did not want to be a distributor, and even today, I resent terminology that does not describe what I do. I, like you, share with my friends things that will satisfy an expressed need in their life. We all do this every day when we suggest a movie, TV program, doctor, item from a menu, place to see, route to take, car to buy, etc. In any of these examples, you and I are not thinking of starting a business.

As an example, you recommend a good restaurant when your neighbor expresses a desire to try some place new. Under the new proposal, you would say, "I really think you would enjoy this place, but you can't go there yet! You must sign this dated paper, so the government can verify a waiting period (which includes only business days), so you can

check out the owner and his close employees - the cooks, custodians, waitresses, accountants, etc. - to see if they have a police record, and a record of accusations, true or not, as well as receive a large document of confidential information on the restaurant's most recent customers to see if any got food poisoning, tripped on the flooring and ended in the hospital, ran out of money, moved, or found a better place, to explain why they had not been continuous regular customers for more than 2 years, as well as a list of satisfied "3 or more year" customers. You must also get a detailed financial report, and to be accurate and up to date, the cash register receipts for the day would be included. THEN..... they could be admitted to the building, so they could make the decision of what to order, and, again, wait for the meal to be prepared. Oops. I forgot, the supplier hadn't delivered all the ingredients.... All this, just to become a new customer at the restaurant I had recommended when my neighbor asked.

Ridiculous? Of course, but all this is logical for me as a person who is telling my friend about nontoxic food supplements.. Technically, I don't sell; I am not a distributor; nor do I have inventory. I only have products for me and my family's personal use. I distribute nothing. NOTHING! The company I am associated with sends the product to those who order. (The terms for the combination of products to support good health, for convenience, are called "packs", varying in size and expense depending on how much product the person needs, either for their own health or for additional family members. - \$99, \$329, \$1095. Yes, a person with intent to do a business can order the same group of products, but they usually do not indicate their intent until they have used the supplements for a period of time.) Many of my people find it difficult to wait even for a few days. Most wish to begin immediately, wanting to know why I don't have products for them NOW.

I am an educator by profession, but only share information with people when I see they have a need. I have no one in 500+ people, who also have talked to their friends, who are distributors or business builders. None of them, that I know of, began Mannatech for the business opportunity; they all wanted to improve their health or share this information with loved ones.

But, I know of several other direct selling companies (Amway, Melaleuca, Salad Master Weekender Clothes, etc.). They do sell things, but why should they be put under such restrictions when they sell their products. The grocery owner, gas station owner, auto dealer, insurance man, etc., don't have a waiting period of seven days before getting a commitment to have a customer, or exchanging money; they aren't required to expose their past mistakes, (intentional or not); They don't distribute such a magnitude of confidential information about their business partners and activities and decisions of their former and current customers; nor do they reveal earnings, or adjust their vocabulary to describe what they do or have to sell.

I shared scientific information about these life changing supplements for almost a year before I became a preferred customer. From the evening I heard, I had been telling my

friends about this information for 5 months before I had my friend order one product on her personal order for me. Six months later, I relieved her of the task of ordering, thus becoming a preferred customer myself.

I have been blessed to be able to receive a little income by my sharing, eg. teaching, to augment my husband's retirement income in supporting our four boys who are still at home. I have learned to be alert to people's needs. (We all need someone to take a few moments to care.) As a teacher, I managed students, but I'm enjoying teaching adults, mostly one on one. I have expanded my "world" from homeschooling and church, clear across the country; I have so many friends now. The biggest change that I see, along with my health, is my personal growth. I am so much more outgoing, and my confidence in myself, which had taken a huge "nose dive" with my health, is growing day by day.

Many people are burdened by all the red tape in life as it is. Why should direct sellers be singled out?

There are many legitimate direct selling businesses. Most companies, like us, are covered by the 3 day right to cancel. Mannatech already has a 90% buyback policy for all products, including kits purchased by a salesperson within the last 12 months. Disclosing lawsuits can greatly hurt Mannatech when we have done nothing illegal. The paperwork involved and giving out personal information will require much more paperwork. (How many stores keep track of why their customers don't return?) Please don't penalize us with rules that would curtail our ability to function.

I appreciate the FTC's concern for unwary buyers from "unfair and deceptive acts of practices", but some of the considered provisions of R511993 appear to be overly oppressive.. Perhaps some of these consequences have not been considered and there are better alternatives available that will achieve the same goals.

Thank you so much for considering this.

Respectfully,

[Redacted signature]

Linda Bruno