

To Whom It May Concern at the Federal Trade Commission:

We are 20 year Independent Business Owners (IBO's) with Amway/Quixtar and have seen several other multi level marketing (MLM) and direct selling companies come and go over the years. Some were ethical and some were scams that hurt many people, both affiliates and the public. We have seen their bad practices harm our businesses, so we are most encouraged to see that the FTC is addressing these problems.

We suggest this: Create a two tier system:

1. Use very exacting rules for companies that are just beginning or are less than 10 years in business. That is usually enough time to flush out the illegal scams and Ponsi scheme companies.
2. Companies that have been in business over 10 years you should allow more relaxed rules because they have proven that they do recruit fairly, pay bonuses, provide goods and services and comply with all regulations in an ethical and businesslike manner, This is the only way they stay in business!

We are very proud to be associated with Alticore, Amway, Quixtar and the DeVos and Van Andel families and all the companies they represent because of the high level of ethics and ethical practices they apply to all their business dealings with IBO's, customers, the public and all regulating agencies.

In the past review of our company by the FTC an interesting statistic was uncovered. The turnover rate of FTC attorney's is higher than the turnover rate of IBOI's.

Quixtar and the IBOAI (our IBO elected board) supports reasonable business disclosures that are fair and help consumers make wise choices. In our view, here is what the rule should and should not require:

The rule...

- Should create a level playing field by requiring clear, simple, and standardized income disclosures that apply to all direct sellers.
- Should provide a reasonable cancellation policy.
- Should not require a seven-day waiting period before prospect could register.
- Should not require IBO references be provided to prospects or disclosure of past litigation.
- Should not require financial records to be disclosed to prospects.

Because our company has been in business over 47 years pleasing the public, customers, IBOI's and all governmental agencies, we feel that the level of restrictions you are considering are not at all necessary for our company.

Sincerely,

Larry and Patricia Krc – Quixtar IBO