

07/07/06

O H Brown  
RL, Inc.

To: Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)  
RE: Business Opportunity Rule, R511993  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

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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 present form, it could prevent me from continuing as an Ameriplan USA, Independent Business Owner. I understand that part of the FTC's responsibilities are to protect the public from unfair and deceptive acts or practices, but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Ameriplan USA products and services.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll Ameriplan USA, Independent Business Owners. Ameriplan USA's IBO initial enrollment option is only \$95.00. People buy TVs, cars, and other items that cost much more than that and they do not have to wait seven-days. This waiting period gives the impression that there might be something wrong with the plan. It also opens the door for buyer's remorse allowing those who have made what seemed to be a logical decision a huge opportunity to experience doubt and change their mind. It also prevents my helping this new partner get into immediate action. It is my goal when recruiting a new partner to help them get a check into their hands as absolutely quickly as possible. I also think this seven-day waiting period is unnecessary, Ameriplan USA already has a 90% buyback policy for all the supplies in the initial IBO training kit purchased. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Ameriplan USA and will then have to send in many reports Ameriplan USA headquarters. This seems extremely excessive red tape that will grossly hamper the production of our business.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Ameriplan USA is found guilty. Otherwise Ameriplan USA and I are put at an unfair advantage even though Ameriplan USA has done nothing wrong.

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. Also, giving away this information could damage the business relationship of the references that may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Ameriplan USA headquarters and then wait for the list. I also think the

following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson. If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers. People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I think in evaluating purchase practices, this ruling would greatly stifle if not fully eliminates the creative process. I understand you are attempting to protect people and in many cases from themselves as well as from those companies that operate in unethical practices. However, when one understands that we are all emotional creatures and we make our purchase decision based upon emotion and justifies it with logic later. This is proven as it is a known statistical fact that anytime we make a purchasing decision of any significance our heart rate increases, our blood pressure increases, our senses are heightened and other things physically occur as a result of our emotional thought process. That same emotional process is what has made this country the great nation it is. This same emotional process is what we use to motivate and empower us as entrepreneurs to go out every day and work to build a better tomorrow for our families. This same process is what our new business partners use to get out the gate and into action building their futures. They will NOT want to wait seven days before going to work! There must be a better way to allow us to continue the creative process yet assist the FTC in their quest to protect folks in a fair manner!

I have been an Ameriplan USA Independent Business Owner for more than 4 years. I became an Ameriplan USA Independent Business Owner because I like many Americans were looking for hope and an opportunity that allowed me to work from home, set my hours, and build an income. Today my family depends on this income to live as it is providing me just under \$50,000 per year. I am PROUD to represent Ameriplan USA and welcome anyone to do their own due diligence and research on our services and our opportunity.

I am realistic however, and know that what is proposed in this ruling will **DRASTICALLY** affect my growth in my business and **NOT** in a **POSITIVE** Way! Please **HELP!**

I appreciate the work of the FTC does to protect consumers, but I believe this proposed new rule has many unintended consequences and that there must be less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

O H Brown  
National Sales Director