

Richmond HJ Garwood, BSME

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

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 with TriVita, *and destroy my small business.*

I have been an independent home based business *Distributor* for over 17 years. Over the years, I have gained a better understanding of America's "Free Enterprise System" directly because of my MLM experience. I have also gained communication skills and the ability to serve people, the basis of business.

Originally, I started my Network Marketing business because of the products. I truly loved them and wanted to earn some additional money. As I started to tell others about my experience with the products, I started to gather customers and a business was born.

Please don't let this unnecessary Rule destroy our small business!! We need it!

America was built on the backs of small business owners.

Some of the sections in the proposed rule would make it virtually impossible for me to sell my product, and therefore, continue in business.

One of the most difficult sections of the proposed rule is the seven day waiting period to enroll a new *Distributor*. TriVita's sales kit only costs \$35. 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 as 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 actually anti-small business.

The waiting period will give the public the idea that there's something wrong with TriVita or our business plan, and this also reflects badly on me. I also think this seven-day waiting period is totally unnecessary, because TriVita already has a 100% "buyback policy" for its products.

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 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.

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. It will actually 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 rule will hurt me.

Thank you in advance for your favorable consideration of this request.

Sincerely,

Richmond HJ Garwood
Independent TriVita Distributor