

I appreciate the work that the FTC does to protect consumers. I am writing about the proposed FTC business opportunity rule R511993 which eliminates the minimum \$500 investment and places my business under the current franchise laws. My company has the absolute highest integrity, has a 'no question' money back guarantee on its product, and is totally committed to its members. In an economy where we are experiencing outsourcing and downsizing and, at least in my state (Michigan) record unemployment rates, this business is a welcome relief for me and many I know. It has allowed us to represent an extremely high quality product, whose benefits are becoming widely recognized. We are able to help others with their health and to supplement their incomes (or lack thereof), thus putting money back into our anemic economy.

The personal development training stresses integrity and caring first. It has helped me become a better overall person and is absolutely free. It has helped me with my presentation, speaking and interpersonal relationship skills. I feel that this rule will be detrimental to my business. The majority will suffer because of a few bad apples. These people can already be prosecuted under current ponzie scheme rulings, which the FTC was already instrumental in writing. My 81 year old mother is on social security. She is so positive about Vemma that she has shared it with her friends, who are also long term customers. The commission allows her to get a huge discount on her vitamins and essential minerals and some months free.

The seven day waiting period will cast a light of doubt on a great product and business, just because it is there. The litigation reporting does not distinguish between winning and losing suits. Anybody can sue anybody and cast a bad light on a legitimate business opportunity. The administrative data collecting requirements will require Vemma to put unnecessary money into databases to be able to provide members with references (which I already do) and provide the names of sales people who may or may not want their names and contact information shared with others. The bad companies will find ways around this law and will still need to be prosecuted, as they do today under current law.

I feel the money spent to implement this litigation would be better spent on education...providing information to potential business owners on how to evaluate valuable, legitimate business opportunities. They should be supported by a first class member services staff, have high quality support materials and advertising, provide excellent online support, and first in class personal development training (which in our case is free as a member through Vemma University.)

Please take this under consideration and help the millions of people who are able to contribute to our economy through these direct sales business models, when there are few other opportunities available to them in their areas.