

July 10, 2006

Kevin & Debra Rouelle

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC

Re: Business Opportunity Rule, R511993

To Whom It May Concern:

Although we understand that the FTC wants to make sure consumers have all the information they need to make an informed decision, we also feel that some of the proposals will be detrimental to our business.

We began our affiliation with Quixtar in May of 2002. We have been very successful in following the system presented to us. It was not presented as a "get rich quick scheme" and we have continued to emphasize the fact that the system works if you WORK it. We always understood that if we didn't follow the proven system we would not experience the presented results. We emphasize that if you don't work the business you will not make any money. We also emphasize that you cannot register one person and expect to make any money. I'm sure that a very large share of complaints that may have come in would be from IBOs that did not follow the system and therefore shouldn't have expected the presented results. The plan was presented as a 2-5 year program to reach the 7500 point level. We emphasize time investment in the beginning with very little money. We reached the 7500 point level in just under 4 years (and we weren't very active with the business for the first 6 months). The education system that is promoted is vital to the success and that too is heavily encouraged, although it is not mandatory. It is the best training system I have ever experienced when it comes to real life business and success principles, and I have a four-year college degree in Accounting, and have been an accountant for 21 years. The personal growth and self-confidence that we both have achieved by our affiliation with this training system is phenomenal. That in itself has made our involvement priceless. This opportunity is allowing people all over the world the ability to build a business for themselves, people that otherwise would never have that option. The monetary investment is minimal, \$130, and includes a sample product kit. Plus, it comes with a money back guarantee. I see that as absolutely NO RISK. We offer many ways for our prospects to get more information before making their decision. Quixtar has a visitor section that outlines company history and facts. They disclose the

average income of an IBO on the registration form. We also give our prospects a “get the facts” card directing them to well known, independent, reputable web sites to research. We also offer public informational meetings where they can get more information ask questions and meet other people affiliated with the business. If anyone gets involved without enough information, it is his or her own fault.

Proposed rules and our objections:

1) The seven day wait rule:

We strongly believe this would be very detrimental to our business. Our plan is not complicated and does not require in depth negotiations. The agreement can be read, discussed, and researched in one evening. By the time the seven days is up, that prospect could have already introduced other people and could have seven days of business volume to collect commissions on. That rule could prove very costly to many people’s businesses, not just from the standpoint of lost volume, but because of the cost of lost efficiency. By that I mean, it would take two weeks to accomplish the same things we can accomplish in one week now. The rule is not needed because as it is now, if the new IBO decides within 30 days (not 7) that they have changed their minds, they receive a full refund of their registration fee. They may also return the product kit and receive a refund for that. The only thing this rule would do is slow us down and cost us a lot of money and time.

2) The requirement to provide references:

Our prospects have many opportunities to meet existing IBOs before registering. As I said before, we offer public informational meetings. Here they get more information and other IBOs are available for questions. In fact we encourage getting prospects and new IBOs around other team members as soon as possible to give them more information. We even set up appointments for them to meet other existing IBOs. Therefore, there is no need for this rule. It would not accomplish anything and would just prove detrimental to our business. It would put us at risk of losing our prospects because if they contacted a name on that list, there would be nothing stopping that reference from registering the prospect in their business, stealing them away from our business. This is opening another can of worms. I can see that really causing problems, watch the complaints flood in then! In addition, I personally find this proposal a violation of privacy and would not want other IBOs giving out my information to anyone.

3) Providing a Litigation List:

I have a real problem with this one because the average person could interpret this information any way they want to. Since the proposal is so vague in the definition of “seller” we could be forced to provide information on cases that are not even substantiated, and would have to include not only Quixtar, but IBOs all over the world. It would open Quixtar and other legitimate companies to false accusations. This could put us all out of business real fast. There are too many positive things about this business to go putting such a negative slant on it.

4) Earnings disclosures:

Our presentation is very detailed in explaining earnings at different levels of the business. We outline the income potential at various levels, explaining that it will fall within a fairly broad range depending on structure. It is very specific as to income ranges within the various commission percentages. It would be impossible for us to detail the thousands of different scenarios. Once we explain how the commission chart works, anyone can calculate the income in any situation they may be interested in. Quixtar discloses the average monthly income of IBOs on the registration form.

5) Financial Substantiation:

We outline the costs we incur each month in our business, so there are no surprises. However, the business presentation takes care of the potential income levels offered by the business, as I mentioned above. There would be no purpose in providing a prospect with my individual income information because that person could make much more or much less, (even though they may be at the same percentage level) because the income depends on how they structure their business. Again, another can of worms is opened if they reach the same level we are and are not making the same amount of money. It is totally dependent on how they structure their business, which is explained in detail in our presentation. For example, if I personally introduced 9 people to the business, my income would be significantly more than someone who introduced 1, but who has 9 total because that 1 introduced 8. That one who introduced 8 would be making more than the one whom registered them! Hence, we are not a pyramid, because the one at the top doesn't necessarily make the most money!

We urge you to seriously consider how these proposals can negatively affect the profitability of thousands of Quixtar IBOs all over the world. I hope that you will have this business presented to you so you can truly understand what we are doing. Only then can you make good decisions. Quixtar has had such a positive impact on so many people's lives, average, ordinary people who are now making a difference. Please don't implement unnecessary rules. We believe that Quixtar has covered all the bases when it comes to proving they are a legitimate business. Others just need to do the same. If they aren't legitimate, they won't be able to. We feel that these proposals would prove detrimental to the legitimate companies while the illegitimate ones would simply ignore the rules anyway.

Thank you for your time in considering our objections,

Kevin & Debra Rouelle