

July 12, 2006

RE: Business Opportunity Rule - 16 CFR Part 437

Dear FTC:

We (my wife and I) have been Quixtar IBO's since 1991. Our backgrounds coming into this business were as an employee of a major computer firm and then current owner of a mid-sized computer software company and my wife as a CPA and principle in a mid-sized regional accounting firm. We continue part-time in these professions today as well as remaining actively involved in building our Quixtar Business.

Upon being presented with this opportunity in 1991 we were given adequate documentation including an SA4400 describing the business plan and average incomes. We were also personally introduced to MANY others who had decided to pursue this business opportunity and who had achieved various levels of success. We continue to this day presenting this business in much the same way and providing the same information as we did then.

In the 16 years and throughout our entire group, this would include HUNDREDS and HUNDREDS of people, we have had only ONE person ask for their registration money back and it was promptly refunded by the corporation!! We present the fact that every Quixtar product including the registration fee is fully refundable and that if they (the new IBO) is not completely satisfied that they can request and will receive a complete refund. This reassures the prospect that we are NOT just looking to sell registrations and that we are truly looking to help them build a successful business just as we were helped.

This business opportunity has provided our family with much more than we had ever expected and it would be the greatest tragedy to impose a set of rules that may adversely effect the "view" of this business as new prospects are reviewing the already "more than adequate" information provide to them. We are NOT looking to "hook" people, we are looking for "business partners" who we invest great amounts of time into to help them achieve their goals as we have with this business opportunity.

There are several issues regarding the proposed rules change that concern us. First a seven-day "waiting" period not only is unnecessary but also would negatively impact our business development. We already provide a 100% money back guarantee and see no need for such a restrictive rule, other business opportunities should follow our lead and grant a 6 month refund policy or at least be required to hold these monies in escrow within a "regulated" environment. This would stop most ALL bogus operations in their tracks!!!

Secondly, to provide a listing of other IBO's as a reference in order for the prospects to contact these people would be an extreme invasion of privacy. With our system we "meet" with each other on a regular basis, prospects are invited to attend these (at no cost) so that they can meet others who have decided that this business is for them.

Thirdly, a litigation list!!! The longer a company has been in business the more litigation, however frivolous, have been brought against them. This serves only to penalize the long term, legitimate business, as the “new” opportunities would have no litigation history and therefore “appear” legit. These are the type of business opportunity that need to be regulated, the NEW ones, especially those that plan the “hit and run”. Protect people from them NOT from legitimate business like Quixtar!!

Our forth and fifth issues, concern specific earning disclosure and financial disclosure. We provide a form, a corporate produced SA4400 that covers the earning potential issues as already mandated by the FTC, and providing “financial” disclosure of personal earnings is the same as someone asking me to divulge my personal income and tax information...totally out of the question, this is private information just like everyone else’s income.

In closing, the Quixtar business opportunity has provided my family with untold benefits and it would be a grave tragedy to impose such restrictive measures that this business so that it would not flourish for the next 50 years and it has for the past 50. Something this long standing would not have continued had the opportunity not have been presented legitimately and would have crumbled long ago if it was not providing great benefits to those involved. PLEASE do not take this opportunity away from the millions of future IBO’s who would receive the same benefits as my family has over the years. Placing undue restrictions and requirements on the Quixtar business will not change the ill-legitimate business ventures and their unscrupulous attempts to “get” the money. THEY should be required to meet specific standards and should be required to “register” on a State by State basis BEFORE they promote their opportunities, isn’t this a requirement of “franchises” – State Registration – why not other business’s presenting similar opportunities? Require “registration” with EVERY State’s AG or similar agency and model the “business” presentation requirements after some successful, legitimate company that has been around for 40 – 50 years.

Sincerely;

Michael Perreault
A VERY satisfied Quixtar IBO.