Federal Trade Commission
Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20508

Re: FTC Business Opportunity Rule R511993

Dear Sir or Madam:

I am writing this letter concerning the proposed Business Opportunity Rule R511993. I believe that in its current form, it could make it extremely difficult for me to continue operating as an AdvoCare Independent Member. I understand that part of the FTC's responsibilities is to protect the public from unfair and deceptive business practices, but some of the sections in the proposed rule will make it very difficult, if not impossible, for me to successfully share products and the business opportunity.

AdvoCare International, a direct sales company based in Carrollton, Texas, offers high-quality nutritional products. I became a Member of AdvoCare because I like the products and wanted to earn some additional income. There are more than 100,000 AdvoCare Members across the United States that this new rule, if implemented, would burden.

I would like to share several key concerns. First, I am against the seven-day waiting period to enroll new Members. An unrealistic delay would cause uncertainty and become extremely burdensome. AdvoCare's sales kit costs only $50. Consumers may purchase products that cost more than a kit and they do not have to wait the seven days. This waiting period also may imply that there is something inherently wrong with the business plan. I also think that it is unnecessary because AdvoCare already has a buyback policy for all products and the sales kit purchased by the Member within the last 12 months. Under the proposed waiting period, I will also need to keep very detailed records when I first speak to someone about AdvoCare and will then have to send in many reports to the AdvoCare Home Office. Those requirements would create an impractical and undue burden on my time as an independent Member.

Second, the proposed rule requires the disclosure of individual salespeople or product purchasers geographically closest to the prospect. I am willing to provide references, but in this day and age of identity theft, I am very uncomfortable giving out the personal information of individuals to strangers. People are very concerned about identity theft and will be reluctant to share their personal information with people they may have never met.

Finally, the disclosure practice would also cause undue delays in enrolling prospective product purchasers or Members: For example, in order to get a list of 10 prior purchasers, I would need to send the address of the prospective buyer to the AdvoCare Home Office and then wait for the list. The momentum to make the purchase may be lost. I also think the proposed rule will prevent many people from wanting to sign up as a Member.

My family depends on this income, and the proposed rule may greatly hamper my ability to contribute to my family's well-being. I appreciate the work of the FTC to protect consumers, but I believe there are less burdensome alternatives available in reaching its goals.

Thank you for your time in considering my comments.

Sincerely,