

Hi ,

My name is Richard Hecock and I have read the proposed FTC proposed Business Opportunity Rule R511993 and I wish to express some comments and concerns about the proposed rule.

I am an Independent Business Owner (IBO) with Quixtar. I have been an IBO for three years. The Quixtar business opportunity, I feel, is the best that is out on the market. By partnering with them, I and my family, have been able to start to meet financial and lifestyle goals. The education system we plug into, has changed me personally and relationally. I have been learning and growing to be a better husband, father, and citizen.

The income that is provided through the Quixtar opportunity, will also allow my wife and I to retire so that we can have more time with our new daughter.

When this business plan was shown to me, I was skeptical at first; however, after reading through the paperwork given to me, meeting the people that I would be working with, and listening to the leaders of my organization, I found them to be real, honest, and integrable. All the information that was provided to me has come true to this point.

I also strive to show each person I speak with about the Quixtar business, all the facts, give them time to make an informed decision, meaning I don't press for one on the spot, and answer all their questions. I place my personal commitment and integrity on the line each time I show our business plan, and back it up with my actions.

I think one of the best things that we do is we stress to those checking our business plan, that 1) it is a 2 – 5 yr plan not a get rich quick scheme and 2) that I have to help that person make money before I see anything in monetary form. It is the fairest plans out there. Truly win – win.

For our business we charge \$260 to register, this includes a product pack, a book on leadership, and access to the Quixtar and TEAM websites. If the person decides they have changed their minds, they can return all the items for a full refund and cancel the access subscriptions for a refund.

Specific points I wish to make:

Regarding the seven day waiting period:

I do not understand the benefit of requiring this waiting period. Most people make their decision in 24 to 48 hours. That is more than enough time to make an educated decision on whether to join or not. By making people wait seven days, it will very hard to continue to follow up with them and get them so that they make money faster. It will also make it more difficult to help them make money faster since they would in turn need to wait an additional seven days for them to register someone else. That is a total of 14 days at a minimum or one half of a month. Mainly that is 14 lost days of the ability to make money.

Regarding the requirement to provide local references:

This would not be a fair practice. Our business depends on going into new areas, and working with people we meet / know to start them in the Quixtar business. If I had to provide local references, and if no one else was in that area, that would mean I would not be able to register a new person. That would be unfair to the person that sees Quixtar as an opportunity that would work for them. In addition, not all partner organizations within Quixtar operate the same way. If I had to provide references from other organizations, that would be extremely confusing to the new person. That would also be unfair to that new person.

Further, I feel that this would go against privacy laws that the Federal Government has put in place. We as potential references, could be contacted by people we don't want to be associated with. Then if my address is shared, they could come to my doorstep. I don't feel safe with that and feel that it would go against the current privacy laws.

Regarding the requirement to provide litigation lists:

This would be unfair to me as an Independent Business Owner. Quixtar is a solid company with integretable practices and business plan. However, why should my business be hurt if for some reason someone else has a different opinion. Someone that looks at their emotions rather than facts. Anyone now days can sue for anything. It doesn't mean that their claim is legitimate.

If you wanted us to provide a list of litigations, that have been proved in court that something wrong was done, I don't have a concern about that. That would be a concret fact not someone's opinion. Also if a case was proved in court but under appeal, that shouldn't be considered a valid litigation to be shared.

Regarding the requirement to provide earnings disclosures:

Quixtar already provides materials (Form SA-4400) that disclose what the average active IBO makes per month. I don't feel that anything past that should be required.

Regarding the requirement to provide financial substantiation:

I feel what I make is a private matter. In my current job, I am not required to disclose what I make with my co-workers. If a person asks me what I make, I tell them that I am on track for retiring by the 5 year mark. Other than that information, I don't think someone else has the right to know. Also by providing records, it might be more confusing than helpful to the person.

In closing, I want to say how much I appreciate the FTC and all those involved, for watching out for fraud and those people who want to take advantage of others. I feel that is necessary and needed. However, not to the level of penalizeing those that are not taking advantage of others.

Thank you.