

July 13, 2006

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: Business Opportunity Rule, R511993

I have been in and out of multi-level marketing plans for twenty years and have only myself to blame for my success and failures. I am currently involved with the XanGo™ Corporation as a Distributor, since May, 2005. My belief in the product and the company have surpassed anything I have ever experienced.

The MLM companies offer a ray of hope to many people who have nothing left. The MLM's are the true essence of the "free enterprise" system.

I sincerely appreciate the FTC's concern regarding consumer protection against fraudulent companies. However, it has been my findings that fraudulent parties will offer fraudulent information regardless of what rulings there are. Personally, I am working to build a secure financial future for me and my family. I do not promote "get rich quick" schemes or paint fraudulent pictures. I simply share the product and opportunity with friends and acquaintances. And, as with anything else, they decide if they want to join or not. It is simple. I would like to see it stay that way.

A few points in the proposed Business Opportunity Rule, R511993 that upset me are:

1. Elimination of the \$500 business threshold. My company only charges a \$35 membership fee. Will this also apply to businesses such as Sam's or Costco?

2. Seven-day waiting period. Decisions made in this business are made on an emotional level. Putting a “waiting” period on enrolling is worse than the “waiting” period to purchase a gun. And the criminals still have guns.
3. References. This requirement involving the ten nearest existing sales people, greatly infringes on the privacy of the existing distributors and opens new horizons for identity theft.
4. Litigation reporting. My belief is that we should eliminate the lawyers and make it more difficult to “sue” people and companies. My father smoked almost all of his life, and as far back as I can remember, the cigarette packages stated that smoking may be hazardous to your health. This did not keep him from smoking any more than my constant nagging did, and we did not sue the tobacco companies when he passed away at 84 with heart disease and prostate cancer. And, had he passed away at 44 with lung cancer, we would not have sued then, either, because it was his “choice” to smoke. Nobody made him.

Therefore, litigations, either positive or negative will carry adverse reactions to our business. With today’s technology, research can be easily made through the internet. I just do not feel this is necessary.

In conclusion, I would like to see the Business Opportunity Rule, R511993, abandoned. If there are companies that are performing illegitimate acts, find a way to punish, abolish and fine these companies without affecting the whole industry.

Sincerely,

Deborah B. Watkins