

To Whom It May Concern:

We are Independent Business Owners (IBO) affiliated with Quixtar. We have reviewed the FTC's proposed "Trade Regulation Rule on Business Opportunities" and felt compelled to share our point of view with you.

We have been building this business for a couple of years and have attained a level of "platinum IBO". The flexibility and income potential of this business opportunity was and continues to be a primary reason we build this business. Along the way, we have developed strong friendships, enhanced interpersonal and leadership skills that are transferable to our fulltime careers, and an additional income that gives us a little extra peace of mind when it comes to our finances. Through this business opportunity, we have had and continue to have the ability to make a positive difference in the lives of many people and that is very important to us.

One of the reasons we were attracted to Quixtar initially is the honesty and integrity of the people who shared the business opportunity with us. We received all information necessary to make an informed decision and conscientiously do the same when we sponsor others. We make it clear to people that there is work involved – this is not a "get rich quick scheme."

We understand the need for rules and guidelines to protect consumers and business owners. We support reasonable requirements that help consumers make informed decisions. That said, we believe several proposed requirements would be burdensome and unfair to honest business owners.

***The Requirement of a 7-day Waiting Period.*** A waiting period requirement would be difficult to monitor and dishonest businesses would be able to circumvent the period, providing a disadvantage to honest business owners. Should the anyone decide not to build a Quixtar business, (s)he is covered by a 90-day money-back cancellation policy to protect all involved. This is in place even though the initial investment in Quixtar is minimal. In lieu of a waiting period, the FTC could require other organizations implement a cancellation period to protect consumers which is really the challenge you are addressing

***The Requirement to Provide Prospects With 10 References*** This requirement would be time consuming, burdensome and a violation of people's privacy. We discourage team members, especially women, from putting their addresses on business cards for safety and privacy reasons. Requiring business owners to provide prospects with a business owner's name, number and address goes against this philosophy. We would be uncomfortable having one of our prospects call a business owner we don't know- they may not have our same philosophy and may try to sponsor the person himself or herself. We are extremely uncomfortable with people we don't know having our phone number and address- it is an invasion of our privacy. In our business, prospects have multiple opportunities to meet other business owners – at weekly informational seminars, at product trainings, team meetings and conferences. These are held predominately in public places and always contain several business owners and their prospects. This method is not time consuming, an administrative burden, nor a threat to anyone's privacy or safety.

***The Requirement to Provide A "Litigation List"*** This requirement, aside from being cumbersome, would open up Quixtar and other legitimate companies to false accusations, which then would need to be shared with prospects. Dishonest companies would continue to ignore the rules and honest companies like ours would be crippled. Anyone in the US can file a lawsuit or claim – whether or not it has merits. Business owners would be so busy explaining the list if litigation and allegations that they would not have time to focus on building the business. When we interview for a job, the company we are interviewing with is not required to give us a list of all litigation, allegations or complaints and we invest more of our time and energy in a job than a part-time business!

We are extremely proud to be in this business opportunity. We strongly support reasonable business disclosures that are fair and consistent across all opportunities. We believe there should be a cancellation policy to allow consumers to change their minds and recoup their investment versus a waiting period. We support having clear, simple, and standardized income disclosures that apply to all direct sellers. However, we do not support requiring business owners to provide prospects with references or disclosure of litigation nor do we support disclosure of financial records to prospects. Thank you for your consideration.

Sincerely  
Shailesh and Kim Pisolkar