

Dear Sir/Madam

This is in response to your proposed rule (16 CFR Part 347).

I wish to express my strong disagreement to the proposal. I am an IBO since the inception of QUIXTAR opportunity and able to reach "Platinum" level. I was registered by a former co-worker and was given sufficient information to make the decision and in my opinion the business plan provide all the necessary information to evaluate the opportunity. I have personally register lot of IBOs and we always provide the information as per SA4400 document. In all my Plans I mention that hard work is required to reach success in this business and as a matter of fact all the literature (audio, video, printed material) given to prospects at the time of exposing the opportunity very clearly mention the average income of the IBO and business plan. Typically, Prospect spend anywhere from \$60 to \$220 based on the optional product kit they choose and all of which come with money back guarantee. I have never ever seen any problem in prospects getting their money back within 6 month - if they decide to do that.

The requirement of Seven-day waiting period:

The requirement will seriously affect the registration process and personally, I do not see any reason for that. It will require further follow-up, phone calls or personal visit which will result in more costs on the part of registering IBOs. Not only that they will have to wait 7 days before they can register anybody. Imagine opening a business where after you have selected a product, you wait for seven days to buy it.

We already offer money back guarantee for much more than 7 days. Typically after I show the plan, I provide the prospects with Literature, audio information and come back in next 1-2 days for follow-up, answer their questions and sign them up. In lot of cases Prospects already know about the plan and want to sign-up.

Please note that all the information about the plan, income is provided during sign-up once again and their consent is require to sign up.

The requirement to provide reference:

I strongly disagree with this requirement. Typically the prospect always meet other IBO in group setting to see the business plan and they are free to ask any questions. I would not like to have some other IBO Providing my specific references (Name/Address/telno.) as this will seriously violate my privacy. it is also possible that prospect might sign-up with other person since the opportunity is same irrespective of sponsor; this is especially true if the reference provide is more successful in the business and has more experience.

The requirement to provide a "litigation list":

This is not so clear as the person presenting the plan have nothing to do with the law-suit against other IBO. The cost of keep and update that information may be high. In my opinion this is equivalent to a Doctor providing the list of all litigation against all other doctors or hospital.

The requirement for specific earnings disclosures

We already provide the SA4400 document , which clearly states the average income of the IBOs. Specific earning disclosure for some example IBOs will add to cost of obtaining that information and maintaining it.

The requirement for financial substantiation:

During the plan, I always mention the income produced at different levels of the business and providing specifics about my income may not be appropriate. Moreover, the business plan presented clearly mention the income base on the size of business.

Your truly

Deep Bhatia