

To Whom It May Concern:

My Name is Tramelle Williams, I've been a Quixtar Independent Business Owner (IBO) for over two years now. After reading FTC proposal, at first I was shocked that our law makers in this country would come up with the ideas proposed in the document given that these rules do not focus on the true problems in the business world, then after researching various other business opportunities, I saw a need for some aspects.

The proposed rules can be a great benefit to individuals who are looking to make better lives for themselves, however the rules are too broad and will hurt the very people that are trying to be protected. The Quixtar business model is built on momentum; the seven day waiting period after receiving disclosures destroys the momentum that is the essence of this business. The concept behind the waiting period is to allow prospects the chance to do research. No time limit is set in our opportunity for a prospect to register and they can always get a full refund if they are not satisfied. Furthermore, the idea of submitting a list of references is an invasion of privacy for IBOs and is unheard of in any other business venture as a regulated mandatory requirement. This should not be required.

The proposed rule requiring a list of all lawsuits, arbitrations, and other legal claims is also a poor choice of regulation. Legitimate companies such as Quixtar would have to disclose claims even if the claims were not true. Fraudulent companies would of course ignore this rule because they are breaking the law to begin with. What should be made mandatory are any and all approval from such organizations as the FTC and Better Business Bureau. The rule asking for different disclosures for every income claim is fair only to the point of not making things complicated. Quixtar already offers a disclosure statement that covers average monthly income without creating an environment that complicates the opportunity.

Finally, the requirement to substantiate any income claim should only be required when necessary for investigation by state and federal agencies. All business owners should be able to substantiate income claims, but not required to disclose it at all times unless the situation falls under the previous statement.

In conclusion, please be mindful of legitimate business opportunities when trying to regulate scams and pyramid schemes. True legitimate opportunities should not suffer because of bad ones.

Sincerely,

Tramelle Williams  
Quixtar Independent Business Owner