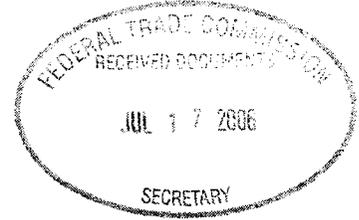




July 12, 2006

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



Re: Proposed Business Opportunity Rule, R511993

Dear Commissioners and Staff:

Your stated purpose of rooting out unscrupulous companies who defraud customers or deceive prospective Distributors is commendable. All responsible companies in the direct selling/network marketing industry are committed to the same objectives. As Founder and CEO of The Limu Company, LLC, I have striven diligently to meet the requirements for membership in The Direct Selling Association. We are proud to comply with their very strict Code of Ethics and rules for fair dealing.

However, if your objective in crafting R511993 was to provide the definitive case study for the law of unintended consequences, you are well along the path to your goal. If it were adopted in its present form you would: (1.) reduce the gross national product by billions of dollars because many products sold through our channel of distribution require explanation or demonstration which is not possible in traditional retail; (2.) crush the dreams of more than 13 million direct sellers and network marketers whose entrepreneurial drive is part of the fabric of our great country; (3.) destroy or drastically curtail the businesses of vendors and suppliers to our industry with all the attendant damage to their communities, employees and shareholders; (4.) impose an unrealistic and uneconomic record keeping burden on all companies and independent Distributors in our industry; thereby driving many Distributors to quit the business and forcing the companies who rely on them to distribute their products to close their doors (5.) punish the many ethical companies for the sins of a few when there is already a sufficient body of statutory and administrative law to deal with miscreants.

Please take the time to learn more about "the good guys" who dominate our industry before you tar us all with the same brush intended to regulate "the bad guys." Our Founding Fathers would probably have said by way of caution, "Don't throw out the baby with the bathwater."

Very truly yours,

Gary J. Raser
Founder/President/CEO
The Limu Company, LLC