

To Whom It May Concern:

I am writing this letter in response to the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing the growth of my Mannatech business. Although the FTC's responsibilities include protecting the public from "unfair and deceptive acts or practices," some sections in the proposed rule will, without a doubt, make it extremely difficult if not impossible for me to sell Mannatech products.

Although I have sold Mannatech products for just over a year and have used their products for just under two years, I have been around the direct sales business model since the age of 12 in 1990. My father and mother joined a direct sales organization. Their marriage improved tremendously. Having the opportunity to work as a unit, to grow a business together and work towards a common goal literally saved their marriage. Being in and around this direct selling business model has helped develop me into the person I am today. My confidence, interpersonal skills, health and personal freedom among many other aspects of my life have improved greatly by being in and around direct selling associations.

I feel that the proposed seven day waiting period to enroll new associates or customers is extremely confusing and burdensome. It confuses business and customer prospects alike by portraying direct selling businesses as a scam, giving the impression that there might be something wrong with the plan or the products. Mannatech has a 100% satisfactory money back guarantee. This waiting period requirement will cause unnecessary delays. I will need to keep very detailed records when I first speak to someone about Mannatech and will then have to send in many reports to Mannatech headquarters.

The proposed rule also calls for the release of any information regarding lawsuits that involve misrepresentation, or unfair or deceptive practices. Nowadays, any entity can be sued for just about anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. Otherwise, Mannatech, Mannatech associates, and I are put at an unfair advantage even though Mannatech has done nothing wrong.

Lastly, the proposed rule also requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Giving out this information could damage the business relationships of the references who may be involved in other companies or business including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Mannatech headquarters and then wait for the list. I also think the required sentence "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" will prevent many people from signing up as a salesperson. In the 21st century, people are very concerned about their privacy and identify theft. Most will be reluctant to share their personal information with individuals

they may have never met, will never meet, and will never even have a business relation with.

I understand that many direct selling businesses are pyramids where founders are looking to make a fast buck by taking advantage of people. These, under government investigations are exposed, and dealt with accordingly. Most successful direct selling businesses focus on helping others. As explained earlier, I strongly believe a direct sales organization saved my parents' marriage. In turn, by presenting that particular business opportunity to other couples going through similar marital hardships, my parents provided a way for hundreds of marriages to be saved. The same business opportunity helped hundreds of alcoholics quit drinking. Some of these families then decided to share the opportunity to their loved ones. And so on. Until finally, when enough lives were touched, my parents were financially free. Some of the people who my father shared the business with also became financially free. Since I got involved in Mannatech, I have personally seen people's lives change dramatically. I present people with a Mannatech business and products so they too can see improvements in their confidence, interpersonal skills, health and personal freedom. My paycheck, as that of anyone in a direct selling business, is proportional to the number of people I have helped achieve a better quality of life. I depend on the income from my Mannatech business.

I appreciate the FTC's concern to protect consumers. I do believe, however that this proposed new rule has many unintended negative consequences to direct sales business growth. I am sure there are less burdensome alternatives available in achieving the FTC's goals.

Thank you for your time.

Sincerely,

Kevin Harper