

June 13, 2006

I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could hinder me from continuing as a Newways distributor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Newways products and sign up new distributors.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new distributors. Newways' sales kit for new distributors costs only \$25.00. People buy houses, cars, and other far costlier items without having to wait for seven days! This waiting period gives the impression that something is inherently wrong with Newways' business opportunity. It would stifle my business by requiring considerable extra paperwork and follow-up communication.

The proposed rule would require that I tell new enrollees about any lawsuits against my company related to misrepresentation or unfair or deceptive practices, even if the company was found innocent. Today, anyone or any company can be sued for almost anything. Unless Newways is found guilty, it does not make sense to me that I would have to disclose these lawsuits, which are already a matter of public record for anyone who wants to find them. Otherwise, Newways is cast in a questionable light even though the company has done nothing wrong. In reality, this rule would encourage companies to sue each other for competitive reasons.

Finally, the proposed rule would require that I give each prospective new enrollee the contact information of the 10 most recent purchasers who live the closest to the prospective new enrollee. Not only would this cause me and my company an undue burden of time and energy to research this information for every new potential customer, but it would violate the privacy and confidentiality of the people provided as references. In addition, it would cause me and my company to lose our competitive advantage by providing customer information to people who could possibly use it for competing business purposes. Finally, the proposed rule would drive away potential new enrollees with the following required sentence: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers."

I have been a Newways distributor for more than four years. Originally, I became a distributor because I love Newways' products and wanted to earn some additional money. Now my family depends on this extra income to supplement our budget. Please don't make legitimate business owners suffer because of the fraudulent activities of a few others.

I appreciate the work of the FTC when you are protecting my rights as a consumer. I believe that this proposed new rule would cause many unintended negative consequences, and I urge the FTC to find less burdensome alternatives for achieving its worthy goals. In effect, this rule could function as a ban on our industry. Thank you for considering my comments.

Vickie Queen