

Beverly Lowe

June 14, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (annex W)  
Re: Business Opportunity Rule, R51193  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
RE: Business Opportunity Rule, R511993

Dear Sir:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule "R511993". I believe that in its present form it could prevent me from continuing as a Direct Selling Company. 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 Mannatech products.

One of the confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new associates. A person can become a Mannatech associate for a cost of only \$99.00. People buy TV's, cars and other items that cost much more than that and they do not have to wait seven-days. This waiting period gives the impression there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary because Mannatech already has a 90% buyback policy for all products including signup product kits purchased by an associate within the last 12 months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Mannatech products and will then have to send in many reports to Mannatech headquarters.

This proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. Otherwise, Mannatech and I are put at an unfair advantage even though Mannatech has done nothing wrong.

Finally, the proposed rule requires the disclosure of 10 prior purchasers nearest the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of references who may be involved in other companies or businesses including those of competitors. Also, in order to obtain a 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 following sentence required by the proposed rule will prevent many people from becoming a Mannatech associate "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to

other buyers.” People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may never meet.

I have been in a direct selling company called Mannatech for more than 2 years. Originally, I became a user of the products sold by Mannatech because I like them and wanted to earn some additional money. Now my family depends on this extra income to supplement our budget.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goal.

Thank you for your time in considering my comments.

Sincerely

Beverly Lowe