

Ronald C. Morgan
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June 14, 2006

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

Re: Business Opportunity Rule, R511993

Dear Commissioners:

We are writing this letter because we are very concerned about the proposed Business Opportunity Rule R511993. We believe that in its present form, it could prevent us from continuing as direct selling associates for Mannatech, Inc. We understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," however; some of the sections in the proposed rule will make it very difficult if not impossible for us to effectively market Mannatech products.

One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period required to enroll new associates. A Mannatech sales kit costs only \$109.00. People buy TV sets, cars, and other items that cost much more than that and they are not required to adhere to a seven day waiting period. This waiting period creates the impression that there might be something wrong with the plan. We also think that this seven day waiting period is unnecessary because Mannatech already has a 90% buyback policy for all products including sales kits purchased by an associate within the last twelve months.

The 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 us that we would have to disclose lawsuits unless and until Mannatech was found guilty. Otherwise, Mannatech and its associates are put at an unfair advantage even though Mannatech has done nothing wrong.

Additionally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. We are always happy to provide references to any proposed customer; however, with the recent increase in identity theft, we are extremely uncomfortable with providing personal information about individuals to complete strangers. We have been recent victims of identity theft that caused us considerable financial loss as well as more than one year in restoring our credit and stability in our lives. We are extremely aware of the risk of identity theft due to this proposed rule.

We have recently been forced to close two small businesses we have operated since 2002. The overreaching tactics of the US Department of Labor, the Washington Department of Labor and Industries, and the Department of Social and Health Services in the state of Washington have created severe roadblocks for us as small business owners. We are unable to charge enough for our services to cover the increased costs created by these three agencies and imposed upon our businesses. Closing these two businesses caused 9 people to be unemployed and 12 vulnerable adults were forced to find alternative housing.

We subsequently sought to create a business opportunity for ourselves without the need for employing people and meeting all requirements of the US DOL and Washington Department of Labor and Industries. Direct selling Mannatech products is the employment opportunity we chose. We need to preserve people's right to privacy while protecting every person's rights.

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

Thank you for your time in considering our comments,

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