

August 3, 2006

Federal Trade Commission  
Office of the Secretary  
Rm H-135 / Annex W  
600 Pennsylvania Ave NW  
Washington, DC 20580

RE: BUSINESS OPPORTUNITY RULE RE511993

Dear Sir or Madam:

After reading this Rule, I have to say that although I suspect that the FTC's intentions are honorable; nevertheless, the very scammers targeted – those individuals who give this honorable home-based business industry its “black eye” -- will be the very same individuals who will continue to find yet another way avoid being accountable. It's akin to paying our taxes: there are those of us who consistently do the honorable thing and pay our taxes year after year after year, and those who do not.

I have been a direct-sales distributor with “XanGo” since February, 2005. My Distributor Kit – which included the “Policies and Procedures Manual -- cost me \$35. That's it! That was my only start-up cost. I did not have to purchase unnecessary product; my product purchase was based on my individual need. (My biggest problem has been running out of product before my monthly “auto-ship!!!)

As a direct marketer, I recognize that the FTC wants to clean up the fraudulent groups and individuals that give this industry a bad name; however, this rule clearly and unfairly targets legitimate, direct selling businesses. For example, the 7-day waiting period is impractical in that it creates unnecessary delays and record-keeping and administrative problems, and casts direct-selling in a negative light. Even more troublesome are the privacy and identity theft concerns that would be created by the recommended “References” proposed. As for the proposed Litigation Reporting, it seems, if/when applicable, that it does not distinguish between winning and losing lawsuits – in other words, outcome of the litigation appears of no consequence.

If the reason, as implied, is to deal with fraudulent companies, is it necessary to impede and burden legitimate direct-selling companies' entrepreneurs? I believe that the FTC can quite effectively deal with the “bad apples” out there without unfairly interfering with those of us who are behaving ethically.

Thank you for reading my letter.

Etta M. Solomon  
XANGO Distributor since Feb 2005.