

CROWN INVESTOR GROUP

June 20, 2006

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

RE: Business Opportunity Rule, R511993

To Whom It May Concern:

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 Pre-Paid Legal Services Independent Associate. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Pre-Paid Legal Services products.

I have been a Pre-Paid Legal Services Independent Associate for more than 2 years. Originally, I became an Independent Associate in my company because I felt the products were exceptional and I wanted to earn additional income from home. Now, I am a single parent and my family is supported through my direct selling business. The future of my family is dependent on the stability of the direct selling industry.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Associates. The Pre-Paid Legal Services start-up fee for new sales Associate only costs \$149. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because this requirement will have a chilling effect on small businessmen and women. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Pre-Paid Legal Services and will then need to send in many reports to my company headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not distinguish between winning and losing lawsuits. It does not distinguish between findings and allegations. 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 Pre-Paid Legal Services is found guilty. Otherwise, Pre-Paid Legal Services and I are put at an unfair advantage even though Pre-Paid Legal Services has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. Identity theft is the fastest growing crime in America today. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses 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 Pre-Paid Legal Services headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as an 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 have never met.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintentional consequences. The FTC’s proposed rule would unfairly target legitimate, publicly held, direct selling businesses like Pre-Paid Legal Services®, Inc. There are less burdensome alternatives available to achieving your goals. The proposed FTC rule should be reconsidered and changed drastically.

Thank you for your time in considering my comments.

Respectfully,

Jonathan Briggs
President