



White Rhino Consulting, Inc.

June 26, 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 Sir or Madam:

I am respectfully contacting your good offices to urge you not to pass the proposed Business Opportunity Rule as it is currently drafted. Many aspects of this proposed rule would be detrimental to my direct sales marketing organization and that of my colleagues.

Firstly, the seven-day waiting period would be an onerous obstacle, as most sales are done immediately. After a new distributor is recruited into a business, the first several days are vital. If this first week is a "cooling off" period, much excitement and momentum is lost. This would not only adversely affect my business, but would ultimately hurt the income potential of the newly recruited distributor.

Secondly, the elimination of the \$500 business threshold unfairly forces the majority of direct selling organizations to comply with provisions that are more appropriate for businesses requiring a larger investment than a nominal \$30-50 direct selling sales kit.

The disclosure of the "10 nearest existing sales people" would be an outright invasion of privacy. Often, there is not necessarily any relationship between someone who happens to live near me and myself. The disclosure of my personal information to a stranger who happens to be interested in the same business opportunity as myself is an intolerable invasion of my privacy. This also opens the door for identification theft and personal safety issues.

The requirement to report all litigation is totally unfair and would be, in most cases, irrelevant. This requirement, again, is an invasion into ones privacy and, since there is

not a distinction between winning and losing lawsuits, this can only be a deterrent to potential distributors and is not just the dissemination of useful information.

I appreciate the Commission's consumer protection priorities, but this particular piece of rulemaking will undermine many direct selling companies. These companies ultimately offer the opportunity for millions of tax-paying Americans to operate their own business and live the American dream.

I again urge you not to pass the proposed rule.

Very Truly Yours,

Jon R. Marple, President
White Rhino Consulting, Inc.