

June 28, 2006

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

Dear FTC Representative,

I am an Independent Business Owner associated with Quixtar, and I have recently become aware of your proposed Business Opportunity Rule. I applaud your efforts in proposing a rule that would require business opportunity sellers to furnish prospects with all the information needed to make an informed decision, combat fraud and prevent acts or practices that are unfair or deceptive. A rule requiring a cards-on-the-table approach to presenting business opportunities is definitely needed in this industry.

That being said, however, I have a few concerns regarding your proposed rule:

1) The requirement of a 7-day waiting period

I understand that you wish to provide prospects, which might be unduly swayed by high-pressure sales tactics, with time to think through the decision they just made. However, I really see no benefit, as Quixtar (and other reputable direct marketing companies) provides a complete money-back guarantee for longer than 7 days. Disreputable companies would simply ignore the requirement, hoping to prey on the prospect's ignorance.

2) The requirement to provide references

In today's information age, I take my privacy very seriously, and I hope that all IBOs do. I am not comfortable with the idea of giving permission for my personal contact information to be shared unrestrained with every potential prospect. And, I'm not comfortable asking others to do that with which I am not personally at ease. There are numerous opportunities available for prospects to meet local IBOs in person, and each IBO could then, on a case by case basis, choose to share their personal contact information.

3) The requirement to provide a "Litigation List"

This is simply an enormous burden for a Quixtar IBO. As worded, not only cases found against Quixtar, but even litigation filed with no merit would need to be disclosed. And, not just litigation involving Quixtar, but disclosure of any litigation involving any and all IBOs from the previous 10 years to the present is required. Forgive me, but I am reminded of this piece of wisdom I picked up somewhere: "Nothing is impossible for those who don't have to do it." Please don't ask us to do this. It would be nearly impossible.

I fully support your efforts in adopting rules that ensure every prospect considering a business opportunity has all the information he or she needs to make an educated decision. Transparency and honesty serve as a solid foundation for my business. A proposal that targets fraudulent work-at-home schemes, pyramid schemes, and other "get-rich-quick" scams is desperately needed. A well-designed FTC rule would shut down bogus business opportunities while allowing Quixtar IBOs to continue to build successful independent businesses.

Thank you for taking on the issue.

<>< Bruce Wehr