

Federal Trade Commission
Proposed new rule

To whom it may concern:

I have been an independent business owner with Quixtar since its inception in 1999. Prior to that I was associated with Amway Corporation. As an independent business owner, I am able to provide for my family. Not only can we create an income, we can also teach our children the value of our free enterprise system. When I saw this opportunity, my sponsor left me with a disclosure document that explained the average income earned by other IBO's, as well as how the compensation plan was structured. This document was clear and concise, just as the one we use today. I tell every prospect that success requires work and effort. We make no income guarantees. This type of information, along with the money back guarantee provided by Quixtar insures that everyone who becomes involved on our team has very low if any risks.

I have several concerns with the proposed new rule for business opportunities.

A 7 day waiting period would seriously limit my ability to expand my business. While I agree that all prospects deserve to be informed and have time to make an intelligent decision. Since most people share this type of opportunity with friends and family first, it would seem illogical to have them wait. I have found that many people we have worked with establish the foundation for their entire business in the first few weeks. Such a delay might hamper or even prevent their success. I think this rule should be waived for all companies that offer a money back guarantee.

I am also concerned with the proposed requirement to give out a list of references of other IBO's. Not only would this infringe on the privacy of these "references", it would also limit new prospects as they would not know who to give as references. It would also penalize me as a sponsoring IBO since any of these references might also like to register my prospect.

The proposal to give a list of past litigations may sound good at first, but in reality it opens pandora's box. While legitimate companies such as Quixtar would attempt to comply, dishonest companies would simply ignore the rule. It would also open the door for dishonest people to flood companies such as Quixtar with fraudulent suits, all of which would have to be disclosed. This type of burden would significantly limit the ability of legitimate companies to expand and grow.

I know of no business that can guarantee income or success. I do think you should be able to back up income claims, but I also feel that a document such as the Quixtar SA4400 which gives an overview of the program as well as average incomes should be sufficient. As in any business, one person's success or failure should not be considered the norm. The Quixtar model, as was the Amway model of business opportunities should be the example for the industry. I applaud your efforts to provide a level playing field for all who aspire to provide business opportunities as well as for people like me who enjoy helping others find success in a business of their own.

Sincerely,
Michael McMillan