

July 3, 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 Ma'am,

I am writing to you regarding the proposed FTC rules as referenced. I will attempt to keep my comments brief.

I was registered as an Amway Distributor in November of 1989. I elected to transfer my distributorship and become an Independent Business Owner (IBO) as Quixtar was launched online in September of 1999. I am currently an IBO and continue to develop my business powered by Quixtar.

My experience over the last 16 years has been wonderful. Though we have had our own personal ups and downs, the team we have been associated with has had the utmost integrity. In addition to that, Quixtar has been above and beyond the call of duty in terms of its professionalism and genuine care of how they act in the best interest of all IBO's. I have never felt deceived or misrepresented at any time. For that reason, my wife and I have decided to commit our efforts in developing our business powered by Quixtar. We have had reasonable success with our business and have been on the cusp of financial independence for some time. We want to continue moving in that direction. We feel that some of the proposals outlined may thwart those efforts. We ask you to consider some of the following comments.

1) Part of your proposal would require a seven day waiting period for those interested in the business plan to register as IBO's. This seems like a reasonable proposal and I believe that the majority of people that register as IBO's in our personal organization may go beyond seven days in most cases. On the other hand, there are several that want to get registered within a day or two. I don't see how this seven day waiting period is a benefit to either the IBO's or the potential IBO. I believe that some people have a higher level of excitement and want to move quickly. That is their personal decision, and they should be allowed to make it. On the other hand, there are others that have a little more skepticism and may want to do some research. Those people may take up to 30 days or so to register. It is their decision to wait that long. The goal within our organization is not to simply sign people up, but to build a long term profitable business. You can only do this with a high level of integrity. In addition to that, we want all of the prospects getting registered to have a true desire to be part of our team, not just someone who was talked

into registering. Therefore, it is our philosophy that it should be the prospects individual choice as to when they want to get registered.

2) Another part of your proposal would require IBO's to give personal references. It is a standard within our team that potential IBO's meet the team (usually 60 – 100 people) prior to becoming registered. They are able to get a great feel for the people that are involved at that point. I believe this is even better than references. As one of the leaders within the organization, I would most likely be one of the references people would use. First of all, I don't really want to give my personal information to complete strangers. Secondly, I would probably have to field two to three calls every day. It would be very time consuming. I believe it makes more sense for people to physically meet several people that they may be working with if they are registered and that process is already in place within our organization.

3) The next proposal covers requiring a litigation list. This proposal will completely cripple our sponsoring efforts. Ongoing litigation has been a thorn in our side for several years now. Most litigation that is presented is based upon personal experience and has no merit under the law. In addition to that, I do not want what other IBO's do to reflect the personal integrity of how I own and operate my business. In addition to that, Quixtar has been extremely forthcoming in the manner in which it has handled litigation over the years. Almost all companies that control large sums of money have been attacked for various reasons by people that have attempted to get a free ride. I am sure you are familiar with this in your profession so it probably goes without saying. I cannot think of one time that Quixtar has misrepresented itself. On the other hand, I can think of multiple things that they have done to benefit the community. Their track record speaks for itself. I know that there are IBO's that may misrepresent Quixtar. I do not want to be unfairly linked to those IBO's. Unfortunately, that has been the case as people arbitrarily write personal experiences in internet blogs and so on. It has put our integrity in question within our local team from time to time. Though we build our business with complete genuineness and honesty, we feel that this negative input has unfairly put us into a negative light. I believe that it has cost us greatly in terms of income over the last several years. A litigation list would further misrepresent our personal intentions. This creates a slanted playing field and does not aid us or the prospects in our pursuit for the American dream.

4) The next item is speaking of specific earnings disclosures and requirement for financial substantiation. Though separate parts of the proposal, I wanted to address them as one. Each prospect that sees our plan receives the document SA-4400, which discloses potential earnings. To my knowledge this is a document that has been reviewed and approved by the FTC multiple years ago. In the registration process, there is already an average income of earnings for IBO's stated multiple times. As far as personal earnings, I believe that is a private matter and is not something I disclose to anyone except my spouse. We don't talk of what income we have made, though we have made substantial income over the last several years, but instead we direct our comments towards what income can be made in line with the SA-4400.

In closing, I don't see how the mentioned aspects of the proposal will benefit either IBO's or prospects. We already operate with a high integrity and genuine concern for the welfare of all IBO's and potential IBO's that are or will be part of our organization. I believe the specific comments of the FTC when our business model was looked at multiple years ago were that we are a business that is "highly desirable in the marketplace." We endeavor to maintain that reputation. We ask you to help us to achieve that by being fair in your analysis and by combating those who do not have those intentions on an individual basis. Please do not create blanket policies that will falsely represent the multitude of IBO's that operate their business in the manner that we do.

Sincerely,

Richard F. Barnhart, Jr.