

July 4, 2006

To Whom It May Concern:

I am an Independent Business Owner through Internet Associates and the Quixtar organization. I have been in this business for almost 2 years now. After reading the proposed rule I have some genuine concerns as to how it will affect the effectiveness of building legal and legitimate businesses like my own.

Through the process of building my business the last two years, my lifestyle, my association, my confidence and leadership abilities have all been positively affected. I am a high school English teacher by day and after starting my own business I have applied many of the principles of success, leadership and financial education that I am learning into my classroom. My students are more autonomous and are able to connect classroom education to real life (something that is not usually done in public education). Personally, I am everyday becoming the successful leader I always thought I was. I lead a team of about 40 people in the Sonoma and Solono counties of California. Our team is growing quickly now and we are growing faster every month. I have been able to witness my best friend from childhood and sponsor (upline) retire this year at 27 years of age. I can see my own retirement is only 2 years away and I am currently working on debt elimination from the education I received from this business.

Before I registered in the business, I took about 2 months to fully check out the business plan and the organization. I was invited to come to as many functions as I wanted for free until I had made my decision. Our local functions, even once an IBO, are only \$5.00, enough to cover the cost of the meeting room. Everyone is always more than willing to give any information that we have to aid someone in their decision. I would never want to persuade someone to register without giving them the information they need, for if I did, I would probably never see them again and they would not build the business. We are in the business of helping ourselves through helping others. Servant leadership. I would not even show someone the business plan unless they expressed some interest in it and a need for it. In our organization (Internet Associates), registration is about \$310 and \$170 of that is their first order of products. All the fees go to some product or service. Our new IBO's are fully aware, as I was, that their success and income in this business is solely based upon their individual effort and results. There are no guarantees.

As to the new rule proposed by the FTC, I do have some concerns. A seven day waiting period before registering would seriously impact the momentum and the number of people that could be taking advantage of the opportunity. When first exposed to the business plan, prospects are introduced to a different way of thinking about cash flow. Most people get that the business plan works, what they need from that point is whether or not it will work for them. Human nature is self-doubt. Without positive association and mentorship from people that have done it on a daily basis, self-doubt creeps in. Many people who would have registered and been successful at this business would not have if they had been required to wait seven days and miss the association. Several people on my team today would not have registered had that been the case.

The proposed rule includes a requirement to provide references before registering. I do agree that it is important for prospects to know what kind of people they will be working with and it is a tell-tale sign of what kind of organization it is. However, I would not want my personal information sent out to someone in the area who isn't necessarily on my team, simply because I'm in the area. Also, in our business prospects are required to come to a meeting and meet the team in order to register. Meeting the team in person is a much more powerful sign of an organization.

As to providing prospects with information on the litigation of the company and its and our personal financial earnings, I believe, will harm the prospect's true view of the organization. For example, I am a member of Internet Associates. We are partners with Quixtar, which means we utilize their online services, but we do not have the same business model as Quixtar. If we were to provide information about litigation against Quixtar, we would be misrepresenting INA (Internet Associates) as that is not who we are. And it terms of releasing how much income we make personally, that is also a misrepresentation of the business plan. The business plan is centered around your personal activity. There is no set time when you should be earning a certain amount. Also, because there are variants in volume from business to business and team to team, every time you hit a level doesn't ensure that you are earning a certain amount. When showing the business plan we disclose this information and give examples of what the income usually is by a certain time and level IF you follow the system. That is one advantage to our system is that people can take as little or as much time as they need to build their business. Oh, and all of the printed and audio material we use has clear disclaimers.

I do believe there should be a rule disallowing the get-rich quick schemes and something that protects people from someone taking advantage of them. People should have available all the information they need to make an informed decision. But I also believe in the citizens' ability and personal obligation to check out an organization for themselves and make their own decision. If we are to have a rule in place, let it not inhibit those who are legitimately building businesses of integrity and truth.

Thank you for your time,

Kami Lederer
IBO – Internet Associates and Quixtar