

**Charles Stivers
PALS Inc.**

July 9, 2006

**Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580**

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Dear Madam or Sir:

With reference to the proposed Business Opportunity Rule (R511993), I am writing to you today to express my concern over how this rule could negatively impact the success of my independent USANA Health Sciences business.

I have been an independent USANA Associate for more than 11 years. When I was introduced to USANA in 1995, I was \$50,000 in debt and ready to make a change away from the construction and contracting industry. Being the entrepreneur that I am, I could see that USANA could be the vehicle I was looking for to create financial success. Within 2 years of being in business as a USANA Associate I became debt free. Since that time, USANA has been one of my main sources of income. Today, I see USANA in a different light. Not only is it a phenomenal business and company that has provided financial success for thousands of people, but it also changes people on a personal level. Personally speaking, I have become recognized for my speaking and leadership skills. I have the ability to inspire and motivate people to take action with their businesses which is something I would never have had the opportunity to do in any other situation. This business and industry has impacted my life in so many positive ways.

I am afraid that with the passage of this new rule, especially the section about the Seven-day Waiting Period would cause prospective customers and associates to feel skeptical or fearful about my company and products. In order to track my work, the paper work and record-keeping would be extremely time consuming and could potentially cause unnecessary delays in the growth of my business.

In addition, the section regarding Litigation disclosure would again shed a negative light on direct selling or network marketing businesses. I find it would be unfair to ethical and legitimate

Companies like USANA because it does not distinguish between guilty or not guilty lawsuits.

Finally, the requirement to disclose ten references of the nearest Associates is impractical and unnecessary. It would cause more delays in the process of doing business. In my experience, the more complicated it becomes to enroll customers and Associates the less likely they will join me in business. I am also concerned about the safety of disclosing personal information especially in this day and age of identity theft.

Thank you for taking the time and consideration for my concerns

Sincerely,

Charles Stivers, Ruby Director