

FTC, Office of Sec'y, Room H-135 (Annex W)

600 Pennsylvania Ave NW

Washington, DC 20580

RE: Business Opportunity Rule R511993

To Whom It May Concern:

I am writing this letter because I just learned about proposed Business Opportunity Rule R511993 and I am concerned. I appreciate your efforts to combat against fraud and deception against illegitimate businesses out there. However, I believe that in its presented form, it would prevent me from being able to operate a legitimate business as a XanGo™ Independent Contractor. It could destroy my efforts to create a successful small business and thousands of others, who are solely supporting their entire families from their XanGo™ income.

I have just started as an Independent Contractor, representing XanGo™ LLC, in the last several months. I loved the product and wanted to share it with others and I decided to work on this as a part-time business. I am a single mother and this type of opportunity allows me as an average individual to start my own legitimate business without the headaches of traditional business. The XanGo™ opportunity allows me to have more freedom to be with my family.

Many aspects of the proposed Business Opportunity Ruling seem impractical in regards to our particular company, XanGo™. The seven-day waiting period proposed in the Business Opportunity Ruling brings up several concerns in conducting business. XanGo™ has 100% money-back guarantee on the product. The current procedures in place by XanGo™ insure that no one can ever be hurt financially by the XanGo™ business opportunity. The XanGo™ sales kit only costs \$35.00 when many other direct selling companies often charge hundreds of dollars to get started as an independent contractor. The proposed rule for the seven-day waiting period to enroll a new independent contractor makes conducting business in a professional manner difficult. People buy high ticket items and don't have to wait seven days. It would put potential prospects on alert that the company is unprofessional in some way. For all the awards that XanGo™ as a company is winning in the industry, this is a company that should be a model for other companies in the industry to study to see how to do business right with professionalism and integrity.

The proposed rule also requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. In this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. This could be very unsafe for women or minorities and pose serious problems. This policy of disclosing individual's information would also further allow competition from other businesses to take existing customers for their own use posing as a prospect. The leaders of XanGo™ believe in integrity and professionalism and giving back to the people, and I believe the success of the company is based on these strong values. I feel blessed to be a part of a company like XanGo™ that shares the same values I believe in. It would be such a shame to see a company like this and their independent contractors unable to conduct business because of the current proposed Business Opportunity Ruling, which would make it very difficult.

Network Marketing is simply an alternative business model, one they even teach now in college business and is endorsed by economists like Robert Kiyosaki, David Butler and Warren Buffett. Unfortunately, many crooks in the industry have given this model a bad name, but that does not mean all of the direct selling companies out there are fraudulent. There must be a way to go after the crooks without taking out the truly great companies in the process. To do so, could have a devastating effect on thousands of families, and possibly the current economy as well. I thank you for considering this in regards to the proposed Business Opportunity Ruling and the effects on my XanGo™ business.

Sincerely,

Shawna B. Newcomb  
XanGo™ Independent Contractor