

## RE-SUBMISSION

My yesterday's submission, tracking # 522418-0851, became garbled in your "comments" section. Please accept this re-submission. Thank you!

Valentin Fyrst

7/12/2006

Federal Trade Commission/Office of the Secretary  
Room H-135 (Annex W)  
600 Pennsylvania Avenue NW  
Washington, DC 20580

### Concerns: BUSINESS OPPORTUNITY RULE, R511993

This note is to express my concern regarding the proposed Business Opportunity Rule R511993. I consider that, if implemented, this ruling would make it very difficult for me to build a business with Oasis LifeSciences products. While I understand and appreciate the intent of the Federal Trade Commission to protect both consumers and potential entrepreneurs from exaggerated, misleading, and faulty claims or information about products and/or business opportunity, the effect of the proposed ruling would be to immediately prompt concerns in the minds of the persons I would contact about Oasis LifeSciences' products/business opportunity. This would put me in a defensive position, from which I would be seeking to build credibility.

The seven-day waiting period would suggest that there may be something wrong with Oasis LifeSciences and its products/business plan. Oasis Lifesciences has a lifetime, full refund policy covering the cumulative purchases for customers, and a 90 day full refund policy for new associates. Furthermore, to become an associate costs only \$20 for the welcome kit. Therefore, the persons we contact are well protected, and the 7-day waiting period would afford no substantial protection. Perhaps it would have merit to introduce a required period of full refund obligation to the Direct Selling Industry.

The proposed disclosure requirement of a minimum of 10 prior purchasers nearest to the prospective purchaser would be problematic. It would oblige each associate to have daily dialogue with Oasis LifeSciences to obtain such data for each new prospect, which would create considerable additional work. This requirement, if implemented, would more than

likely be objected to by the persons being exposed on such lists as well as by the prospects we contact, who would see themselves as the next to be put on disclosure lists. This is explicitly stated in the sentence: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." In our days of extensive identity theft people are very concerned about protecting their privacy, and the proposed disclosure requirement would be dissuasive.

I recently became an Oasis LifeSciences associate with the intent to build a significant business and to help others create income, because of the excellence of their science and their products. The proposed rule would make my task difficult to accomplish. While I see its good intentions, it is my observation that it would have unintended consequences detrimental to the individuals who work in, and depend on the Direct Selling Industry. I believe that less burdensome and less dissuasive alternatives are available.

Thank you for giving me this opportunity to submit my concerns.