

SHEENA HALL

August 11, 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

I would like to invoke my Comments of the Business Opportunity Rule being considered. Please read with the consideration that it is written. I thank you in advance for taking time to read my concerns.

I appreciate the fact that the FTC Commission relies heavily on its law enforcement experience and on consumer complaints in addressing business opportunity fraud. I am sure you have several allegations pertaining to false or unsubstantiated earnings claims. With the false earnings claims I can understand they may be followed by false testimonials, misrepresentations about location profitability, availability of support and assistance, nature of products or services sold, prior success of seller, full investment costs, and refund policies. I am sure there are many unethical and unscrupulous people in the world who have unfortunately found the quickest path to a profitable swindle is through the MLM sales model.

I would like to present you with credible proof that all MLM's are not created equal. With regard to Xango, it is imperative that every XanGo distributor manage their business with the highest degree of truth and candor. No sale is worth sacrificing integrity.

I am a new distributor for Xango Corporation. If this Rule was in place prior to my signing up with the Company, I would more than likely not have taken the opportunity to become a distributor. Since I have signed on, I have learned more information with regard to working with people, making presentations and becoming more literate with the computer than I ever would with my current position I have with a title company. I plan to leave my present position at the end of the year and become a full-time distributor. Should this new Rule come into play, which may impact my future with the Xango Corporation due to impractical practices being made into a Rule by the FTC.

With regard to the FTC's Rule R511993, it will be quite detrimental for the independent distributor. With all the requirements pertaining to time, time is of the essence in sales and you can lose a valuable business partner if you place a rule of 7 day waiting period???. The new Rule will impact the direct selling association and place it in a negative light. The new Rule will affect recordkeeping and create so many administrative problems we can't even foresee the atrocities as of this date. The elimination of the \$500.00 business threshold will impact a huge majority of future direct selling associates. I certainly appreciate your protection priorities, but I feel you need to do some more in-depth research before creating more problems for the people who are trying to climb the entrepreneurial ladder in a professional manner.

The impact this will have on legitimate direct selling companies is going to be hurtful. This proposed Rule unfairly targets our Company and all legitimate direct selling businesses. This proposed Rule needs to go back to the drawing board

With regard to Litigation Reporting, I believe it is unfair and needs some revisions that would distinguish between winning and losing lawsuits. The lawsuits are irrelevant of the reporting of

almost all litigation regardless of the outcome and the Earnings claims are too difficult to collect required data, the FTC Rule is targeted "bad actors" will not provide accurate data, while legitimate companies will and last, but not least, with regard to "References", this is so impractical of finding the "10 nearest existing sales people", with regard to identity theft becoming so prevalent in our world, this will really turn new distributors away.

I appreciate you taking the time to read my concerns. I hope that you can understand that I am anticipating this Rule not becoming effective and that some more study be made into what would work to protect the FTC environment. I am all for protection, but not when it becomes so radical that a person can not make responsible decisions on their own.

Sincerely yours,

Sheena Hall
Independent Distributor
Xango Corporation