

July 14, 2006

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

RE: Business Opportunity Rule, R511993

To Whom It May Concern:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its presented form, it could prevent me from continuing as a Distributor for XanGo™ and destroy my small business. I have been an independent Distributor for XanGo™ for approximately 1 year. Originally, I started my Network Marketing career because of the health benefits I received from the product. Once I learned more about this type of business I wanted to earn additional money to supplement my retirement. The way the cost of living has increased in the past year my family and I have grown to depend on this extra income. Please don't destroy my small business, we need it!

I greatly appreciate FTC's attempt to protect the consumer, but with what I understand about this new rule I feel it will only hamper someone's chances at starting and operating a small business. I understand there are fraudulent groups out there, but these groups will continue to operate regardless of this rule. They will simply lie to the consumer and be gone tomorrow, while legitimate law abiding direct selling businesses will suffer trying to work within these guidelines. Some of the sections in the proposed rule would make it hard or almost impossible for me to build my business.

The proposed waiting period will give the public the idea that there's something wrong with the product or the XanGo™ business plan, and also will reflect badly on me. I believe this seven-day waiting period is unnecessary because XanGo™ already has a 100% total money back guarantee (within the first 30 days), which applies to any new enrollee. This is guaranteed for all new enrollees and is currently and daily exercised freely by anyone purchasing from XanGo™. The current procedures in place by XanGo™ already insure that no one can ever be hurt financially by the XanGo™ business opportunity. The XanGo™ sales kit only costs \$35. People buy TVs, cars, and other items that cost much more than that, and they don't have to wait seven-days. Under this waiting period requirement, I will need to keep very detailed records when I first speak to a prospect and will then have to send in reports to my company. XanGo™ distributors operate small home businesses and this burden could destroy them completely by requiring excessive paperwork, and requiring a person to be a superstar instead of being just an ordinary person seeking to get ahead. With these new proposed rules, the XanGo™ opportunity would cease to be for the average person, and would require one to be an aggressive and capable business person in the beginning. This is exactly opposite to what the XanGo™ business opportunity was designed to do. The procedures associated with the proposed rule change would make it, literally, extremely difficult to build and operate a XanGo™ business. This change would stifle the initial profit and actually make operating a XanGo™ business less profitable than it currently is under the existing rules and procedures. For a new rule to stifle profit should point out the inadequacy of thought that has generated this new rule proposal.

The section of this proposed rule requiring the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser, will overload my business and slow down my progress in attempting to keep or acquire this needed information. It will also increase the time (with the waiting period) in getting interested parties involved in my business.. I would be glad to provide references, but in this day of identity theft, I am very uncomfortable being forced to give out the personal information of individuals to strangers. I worked for the government for 25 years and during that entire time it was repeatedly drilled into our minds not to give out personal information. Especially social security numbers, it is this way with most businesses. Because of this it is

sometimes difficult to get people to release their social security numbers to sign up as a distributor. The requirement to pass this information on to strangers will cause a backlash of complaints with prospective business partners. Requiring this will create a 'Catch 22' situation. First the government tells people not to give out their personal information due to identity theft, then turns around (with this rule) and tells them they have release this information to own a small business. This is not the way to promote business of any kind in this day and age. It would be easy for a fraudulent company to provide a list of "references" who are involved in the fraudulent business, but very burdensome on legitimate direct selling businesses.

Daily I see many scams on the Internet and in the news, scams are everywhere. The proposed rule R511993 will do nothing to stop these unscrupulous crooks. They hurt my business! This rule will not stop Crooks – they violate the current rule all the time. But because I am a good law abiding citizen the proposed rule R511993 will hurt me. Thank you, and please help me retain the right to operate a XanGo™ business where the company, XanGo™ LLC already has procedures in place to protect anyone from loss of money and/or time and credibility. XanGo™ is a good company, please do not lump great companies like XanGo™, which has a 100% money back 30 day guarantee, into the same barrel as those who currently take advantage of others daily with no repercussions.

Please insure that any proposed rules will not be detrimental to the incredible volume of sales created by the Direct Selling Industry, a Multi Billion Dollar industry today. To do so would hurt the United States economy tremendously. Please go after the bad guys, not the good guys.

Sincerely,

Collin W. Lyerla, Jr.,
XanGo™ Independent Distributor