

July 15, 2006

Scott and Bozena Persons
Team One!

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

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

My wife and I are distributors for a nutritional company called Xango. We are writing to your agency because we are concerned about the proposed Business Opportunity Rule R511993. We believe that in its present form, this rule will cause very serious harm to our efforts to succeed in our own business.

We were originally independent distributors for another company, GNLD International, for 25 years. Our network marketing business allowed us to stay home with our children and provide for them until they went off to college. The benefits of working at home far outweighed working at a job outside the home, which we both did for 4 years after we were married. I rarely saw my children then.

Three months ago, we became involved with Xango LLC, because it manufactures an excellent nutritional health drink and provides a solid home-based business opportunity for others. We are working very hard to help other families become financially secure while working out of their home...so they can be there for their growing families, just as we were able to. Through hard work, we are helping to create a legacy for our family and other families we wish to help to have a brighter future.

This dream cannot be fulfilled if your rule goes into effect.

You probably feel you are trying to protect us. We give you the benefit of the doubt, but we feel that whoever came up with these ideas did not think them through from the point of view of hundreds of thousands of American business owners, let alone all the international ones that this will affect in a negative way. Some of the sections in the proposed rule would make it hard or almost impossible for us to sell our product or build our business.

This 7-day waiting period would give the public the idea that there's something wrong with us or our business and would cast us in a bad light. We are network marketing professionals who value our reputation and our standing in the community, and feel we deserve to be treated accordingly. We also think this waiting period is unnecessary, because our company, Xango, already has a 100% buy back policy. Anyway who changes their mind after joining can return their unused product for a full refund.

Americans don't have to have a 7 day waiting period to purchase expensive items like cars or even televisions. Imagine going into Best Buy and spending \$3,000 on a new HDTV...and then being told they have to wait 7 days before they can take their purchase home? No one would stand for that restriction. Why treat grown adults like children? To join Xango, there is only a \$35.00 fee, and there is no requirement to stock an inventory. This is hardly taking advantage of people.

This rule would make us business owners look like shysters that the public has to be afraid of, when in reality we are that public. We are decent, hard working, legitimate, tax paying citizens, not criminals.

Your rule would require us to keep very detailed records when we first speak to a prospect, and we would then have to send in reports to our company. This extra paperwork would be a burden on our home business.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. We are always happy to provide references, but the way this would be carried out is frightening.

Does Walgreens have to give their customers the names of 10 people close to them who are taking the drug that a new customer is buying from them? No. They don't. Would you want them to? No. There would be a public outcry that would be heard all the way to the Oval Office if they tried that.

Well, neither should we. We would have resented it greatly if the people who introduced us to Xango had given out our name and information to total strangers. We would not have joined the company if this had been the case. Therein lies the problem for us distributors. Really, giving out people's names like that is clearly a violation of privacy laws.

Suppose I could walk into my local medical clinic and ask for the names and addresses of 10 people who are being treated for the same medical problem as I am. I would then contact these strangers and ask them if they are happy with their medical results. This is illegal. I would never be given those names because of medical privacy laws. Why, then, should I be required to disclose the names of my customers of a health product to strangers? This is chilling and just plain wrong.

Also, in this day of identity theft, we can't imagine giving out the personal information of individuals to strangers. Imagine giving out someone's personal information to an identity thief...or, worst of all, a rapist? This is completely untenable from every direction.

No one would buy our product if they knew their name and address would be given to strangers for God knows what purpose. At worst, someone could commit a crime against them. At best, our competitors could pose as interested business prospects just to get the names of our local customers, so they could try to lure them away from us. This is just plain wrong.

We have seen many scams on the Internet and been approached by many crooks because of our success. Your rule will not stop them. These people are the ones who hurt naïve people, not we legitimate network marketers. This rule will not stop the crooks – they violate the current rules all the time. Please don't make rules that greatly hinder people who are running a legitimate business. Please help us small business owners by not making our jobs harder and more cumbersome than they already are.

We understand that your intentions are good, but the proposed rule will not have the desired effect. It will, however, make it nearly impossible for us small business owners to continue in our business.

We strongly suggest that you vigorously prosecute all the dishonest scam artists and crooks to the full extent of the law. Yes, protect the public from these people, but please don't cast aspersion on the hundreds of thousands of honest, legitimate small business owners across the country. This proposed rule would do us great harm. Please don't hurt our business.

Thank you for taking the time to read this and for acting in our behalf.

Sincerely,

Scott and Bozena Persons