

Dear Sir:

Please accept my comments on Notice of Proposed Rule Making 16 CFR Part 437. While I appreciate the Federal Trade Commission's consumer protection priorities, I am concerned about the proposed ruling. This ruling would unfairly target legitimate direct selling business. I don't deny the existence of fraud but it happens in all types of business. I have even suffered from the detestable fraudulent activity of identify theft; I find your reasoning for changing the rule to have a slight hint of hypocritical basis.

Why do I say this, I don't think you are anybody for that matter can protect anybody that makes any kind of financial decision based on hype and that's to good to be true alone. Any business carries risk. It is up to the person deciding to go into business to determine how much risk he is willing to take. (Fraud is a risk). When an individual decides to go into business, he should be capable of making his own decision based on the risk he is assuming; the administrative burden the proposed rule will add to my business is severe overkill for the risk being assumed. How much move should you siphon from my bottom line to save somebody less than \$500.00 of risk?

Bottom line is this I don't see how your little rule will benefit me one little bit. I work 40 to 50 hours a week in the "rat race" for companies that have already screwed up my retirement; all I want is shot to build something for myself. What happens, you propose a rule that will do nothing but drive up my cost of doing business? What I'm really trying to say is you will never be able to protect those who make their decision from the somebody owes me guaranteed success, I can get rich mentality that I find so prevalent in today's society.

The seven-day waiting period unfairly cast the direct selling plan in a negative light. The additional record keeping is impractical for any benefit I as a legitimate business owner would hope to gain. It's just flat out impractical!

The elimination of the \$500 business threshold would force the majority of direct selling companies to comply with other provisions that are more appropriate for businesses requiring a greater investment than a direct selling sales kit.

The litigation reporting requirement is unfair in that it does not distinguish between winning and losing lawsuits. Why should I allow you to force me to report all litigation with no regards to the outcome of the same?

The References is impractical, I don't know them and if I did, who knows what they could say about me. I don't know their business, how they deal with their customers, and how do I know that this wouldn't just flat out lead to them stealing my potential client. I am also concerned about the increased exposure to ID theft liability.