

16 July 2006

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

To whom it may concern,

This is in response to the proposed the Business Opportunity Rule R511993, "Trade Regulation Rule on Business Opportunities".

My business has a vibrant history spanning 24 years. It has provided a valued, on-going, additional income. Beyond the income, I benefit from my affiliate organization's business development system, which sharpens my business acumen and opens doors to professional contacts.

Originally, substantiated and accurate information was provided to me, and I was instructed to review all the material. I made an intelligent, informed decision to become involved with Quixtar. I understood this was **not** a "get rich quick" plan, and hard work and long-term commitment is required. My voluntary choice was assured by the established "Money-Back Guarantee".

Today, before they become involved, **ALL** interested parties are given as much, if not more, information and instructed to review the material to make their informed decision.

As an Independent Business Owner (IBO) affiliated with Quixtar, I strongly favor and actively practice providing substantiated and accurate information to people, who are considering joining and growing a Quixtar business. I agree with the FTC's wish to further this intent.

However, R511993 fails to benefit prospective people and is injurious to the ethical and lawful exercise of my internet commerce business. Five proposed provisions are, particularly, objectionable.

One, a seven-day waiting period is proposed. This is unnecessary.

The established "Money Back Guarantee" assures all prospective parties can receive their money in return. This was true when I joined 24 years ago. It is all the more true today.

Two, it is proposed that I would have to provide a list of references. This should be eliminated.

This infringes upon my privacy and the privacy of all current and future IBOs.

Three, providing a list of all lawsuits of alleged misconduct for the past 10 years is proposed. This should be deleted.

This provision penalizes Quixtar and other legitimate companies by opening them to false, alleged accusations. Illegitimate companies would ignore this provision.

Four, a different disclosure for every income claim is proposed. This should be deleted.

Instead, a single, simple, standard "average monthly gross income for 'active' IBOs" could be provided.

Five, I would have to personal financial documents to substantiate any income claims. This should be removed.

This proposal grossly infringes on my personal financial privacy. This is better served by my providing a single, simple, standard "average monthly gross income for 'active' IBOs."

All told, I strongly favor and actively practice providing substantiated and accurate information to people, who are considering Quixtar.

As well intentioned as it is, R511993 fails to benefit prospective people and is injurious to the ethical and lawful exercise of my internet commerce business.

As such, I urge its immediate end.

Sincerely,

Brian Hajime Ogata