

NAME: Ernie & Judy Mansfield

RE: Business Opportunity Rule, 16 CFR Part 437

YOUR INFORMATION:

We have been independent business owners, first with Amway and then with Quixtar, since 1992. During this time we have developed a nationwide network of distributors and have achieved the platinum level in this business.

The Quixtar business has provided us with the following:

1. A monthly income
2. Access to quality products with a 100% money-back guarantee.
3. The convenience of online shopping with home delivery.
4. Association with a group of positive, forward-looking individuals.

When we registered, we were promised an opportunity, one which would require effort and persistence and would reward us in proportion to the work we did. We were specifically told that this is not a “get-rich-quick” opportunity and were also told that the percentage of people who achieve substantial financial rewards is small – as it is in any other field of endeavor. However, the initial investment was small (compared to many other opportunities we had investigated).

We were also promised the help, support and guidance of our upline. This help and support has been present throughout our time in this business, consisting of everything from e-mail and telephone consultation to having our upline meet our prospects (all over the world) and answer their questions and concerns.

When we register other IBO's, we provide them with the same information with which we were provided. The typical registration cost for a new IBO we register is \$60, which is fully refunded if they decide to leave the business within the first 30 days.

We are particularly concerned about the following aspects of the proposed legislation:

The requirement to provide references:

Making the provision of references a requirement violates the basic privacy and confidentiality of the Quixtar business. We would be personally unwilling to have our names on a list that any Quixtar IBO could use for reference purposes, although we willingly give our contact information to other members of our IBO organization for reference purposes.

We have followed a practice of introducing our prospects to other IBOs in our upline and downline as we have developed our business – with the consent of both the prospect and the IBOs. We have a variety of formal and informal means of providing the introductions and references.

To give our prospects a list of “local” IBOs would be irrelevant in some cases – there are prospects who are more interested in references from their professional peer group, regardless of location, than in references from local IBOs.

A requirement for local references also prohibits business expansion into areas where there is not already an existing Quixtar business organization.

Requirement to provide a "Litigation List":

This requirement is absurd. If network marketers are required to provide their prospects with a “litigation list,” then every doctor, lawyer, CPA, plumber, contractor, etc. should also be required to provide a list of all suits filed against him/her in the past 10 years to all prospective new customers.

The requirement for specific earnings disclosures:

The Quixtar corporation business rules require that prospects be given earnings information prior to registering. This is an adequate representation of what the “average” Quixtar IBO earns through his/her Quixtar business.

In our 13 years in the Amway/Quixtar business, we have never had a prospect or new IBO complain that we had misrepresented the income opportunity of the business.