

July 17, 2006

Doug Susol

RE: FTC Ruling

Dear FTC,

Please allow this letter to serve as my deep concern for the ruling you are proposing for the purpose of maintaining integrity and monitoring the Direct Selling/Network Marketing marketplace.

I do understand and agree with the reason you are reacting to this concern... however, please stop the ruling as written because it is an over-reaction that will cause economic carnage for many Americans!

Here's why:

- This industry, although highly misunderstood, is a very viable business model for many honorable individuals who are seeking a way to create additional income. With escalating gas prices and other economic hardships such as the "outsourcing" of their jobs out-of-country, people have found relief in this industry. The ruling as stated will virtually snuff out the life of hope found in this vehicle.
- I agree that there should be regulations in place. The FTC ruling that caused a 3-Day Cancellation of in-home retail purchases was a needed one. It helped stop the high-pressure tactics used by some in that industry. Doesn't a 7-Day period just to decide to spend a couple of hundred dollars sound like OVERKILL compared to the 3-Day period required for something that may have cost a homeowner thousands of dollars to purchase?
- People today are very skeptical and cautious. They aren't going to just jump into any money making opportunity that comes along. I think you are underestimating people. If you still feel some need help because they jumped into something they didn't want, give them the same provision you did with in home owners. This will shake out the "con-artists" who prey on the few unsuspecting.
- You are not giving the industry the respect it should have. Years ago Franchising had similar issues. Now they populate most commercial corridors in this country. This is a PROFESSIONAL business that is coming into it's own... don't cause it to become retarded because of over-killing regulations. Please do some due diligence and notice that there are many incredibly ethical companies. They are eager to comply with reasonable regulations that would keep the industry honest. Companies like: AM Way, Mary Kay, Herbal Life, Mellaleuca, Pre-Paid Legal, Prime America, Nature Sunshine, Shaklee, Alpine, ACN, and my company, Tahitian Noni International. Please meet with the principals of these companies and discuss a more REASONABLE approach to the ends you're trying to accomplish.

- Lastly, give our industry some credit. Just because a few bad apples find their way in, don't subject the entire industry to the same degree you would the bad apples. We want them out too... but not at the cost of hurting many good people also. We welcome your interest in helping to block entry of such like ones. But right now the baby is still sitting in the bath and will be thrown out along with the dirty bathwater.

Please suspend action on this bill as is written and revisit your concern with a more realistic and balanced view. Many cash-strapped people are running legitimate network marketing businesses to help pay their bills. Author something that can be part of the solution and not an addition to their already stressed out lives.

Most Respectfully,

Doug Susol