

July 17, 2006

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

Re: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am very concerned about the proposed Business Opportunity Rule R511993 that is being considered for adoption. I believe that in its presented form, it could prevent me from continuing as a Multi-Level Marketing (MLM) Distributor for Health Care Now, which involves three Home-Based MLM's of AmeriPlan, XanGo™ and World-Wide Synergy and another non MLM Home-Based Business of Out2.com, and destroy my small businesses. Plus, it would prevent me from getting into planned MLM's like Burn Lounge, etc.

I have been an independent Distributor for Health Care Now for more than two years. Originally, I started my Network Marketing MLM's because of the products. I loved them and wanted to earn some additional money besides. Now my family depends on this extra income to supplement our budget and make ends meet (especially since NJ recently increased their State Sales Tax by 1% and will apply it to almost every possible item purchased). Please don't **destroy** my small businesses – they are sorely needed!

Some of the sections in the proposed Business Opportunity Rule R511993 would make it hard or just about impossible for me to sell my Health Care Now Company products and services. This proposed waiting period will give the public the idea that there's something wrong with me or our plan and also reflects badly on me. I also think this seven-day waiting period is unnecessary, because Health Care Now already has a first two case buyback policy for all XanGo™ products. One of the most difficult sections of the proposed rule is the seven day waiting period to enroll a new Distributor. New XanGo™ Distributors **only pay** \$35 for their distributorship (this fee is non-refundable). People buy TVs, cars, boats and other items that cost much more than that and they don't have to wait seven-days. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone as a prospect, and will then have to send in reports to my company. I am a small home business and this burden will severely hurt or destroy my business. This proposed rule is very bad because of the heavy burden on a small business owner and it will not stop or prevent crooks from operating.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. This rule is also impractical because there may not be 10 people in a small town or

county. My XanGo™ MLM business involves distributors all across the country and there is a very slim chance of finding 10 distributors in my local area. Women in my organization may be subject to sexual or racial harassment so this part can't be adopted at all, unless the FTC passes an addition to this rule prohibiting sexual or racial attacks related to this disclosure. In the end the rule must bind the FTC to take direct enforcement action on sexual and racial attacks with a special unit required to be assigned to monitor actions related to the disclosure forms (this would be an **awful waste** of **tax dollars**).

In conclusion, I have seen many scams on the Internet and been approached by many crooks because of my success. **This rule will do nothing to stop them.** They hurt my business! This rule will not stop crooks – they violate the current rule all the time. But I am a good American citizen and it will hurt me. Thank you and please help me.

Sincerely,

David I. Middlekauff