

Ben Fanara

To whom this may Concern at the FTC

I have been involved with direct sales for over 10 years – I work out of my home with a co called TNI. I market a healthy beverage (Tahitian Noni juice).

Your proposed new rule for network marketers will make it very difficult for me to present my business opportunity to my prospects.

The 7-day waiting period unfairly discriminates against direct sellers when other businesses are not similarly restricted.

The litigation reporting requirement is unfair - it does not differentiate successfully defended litigation from meritorious claims.

It will be extremely impractical to locate the 10 closest distributors to the investigator of the opportunity.

To locate the 10 closest distributors raises privacy disclosure concerns.

I want to thank the FTC for attempting to right the wrongs of unethical companies, but this new rule if approved goes too far.

Thank You

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