

My name is Saketharaman S Vempralam. I have been an Independent Business Owner(IBO) powered by Quixtar corporation for the past 6 years. I am a software Engineer by profession and have been working as a software Engineer for the past 8 years. While I have been able to provide for basic necessities for my family (myself, my wife) here with my income from my profession, I had registered to become an IBO with Quixtar to accomplish some goals that I WILL not be able to achieve just through my income as a software professional. This has been the perfect business for us, because this is the only business that fits our current lifestyle to provide for a better lifestyle in the future. My wife is also a software professional. Because of this business opportunity, we have been able to create income that has allowed her to stay at home for the past couple of years. We are getting ready to have our first kid this year and because of this business she is going to be a stay at home mom for our kid which was one of our goals to start with when we registered as an IBO with Quixtar. We have always known from day one through our sponsor that protecting the integrity of the business is the only way to build a big and profitable business in the long term. That is the reason why we were given all the relevant information before we got registered in the business and that is exactly what we do today when we show the business plan to the prospect. When they register for the business opportunity through us, they spend about \$150 which includes an optional product pack. All the money that they spend to register in this business is refundable for 180 days. This is made very clear to every prospect before they register. While I understand FTC's intentions for the proposed rule change, I feel that the following few points are going to severely affect the way we build our business: 1. The requirement of a seven day waiting period: This would allow the prospect 7 days to make the decision to get into this business even if the prospect has NO concerns or questions. Our business has a 180 day money back guarantee and I believe they have 180 days to do all the research they want and if they choose to get out of the business they can and they can do this by directly contacting Quixtar corporation without going through us. No questions asked. Isn't this enough time? If this rule is implemented a prospect who decides to get into this business cannot grow the business as fast as he/she wants. This would severely impact the overall growth of his business and in turn realization of their goals. So I request this requirement be completely eliminated. 2.The requirement to provide 10 references: This would be fatal to our business because any of the 10 references can register our prospect with their organization while we work hard to show the plan to the prospect. As an IBO myself, I don't feel comfortable giving my information and acting as someone's reference. Why should I take prime time out of my business to act as someone else's references while I don't benefit at all in this context? If I feel that way, then I am sure others will too, so it becomes even more difficult to get references and provide it to my prospect. Again the prospect has 180 day money back guarantee so what benefit is it to provide references? So I request this requirement be completely eliminated. 3. The requirement to provide litigation list: The purpose of this rule is very unclear. Why should we give a list of litigation to our prospect? The rule does not specify who a "seller" is, so it could be against any IBO who registered in QUIXTAR just to spoil its name and does illegal things that are outside of the already established FTC boundaries and gets sued because of this conduct. Why should my business be affected because of this? So I request this requirement be completely eliminated. 4.The requirement for specific earnings disclosures: During the registration process ALL the prospects are given the average

monthly gross income of an active IBO registered with Quixtar corporation. Actually this information is also in the take-home material that we give to the prospects after they have seen the plan. What value does additional earning disclosure provide? It will be extremely tedious to make a separate disclosure for every example I use in explaining the income potential of a Quixtar business to a prospect. So I request this requirement be completely eliminated. 5. The requirement for financial substantiation: I am really uncomfortable sharing my financial statement with a prospect I don't know that well yet. In any business the rewards are equivalent to the efforts one puts. So even if I substantiate my Quixtar income to the prospect, it does not mean anything. The income they make will be equivalent to the efforts that they are willing to put. I cannot limit the potential of this business with the limits of my efforts. So I would not want the prospect to make a decision about the income potential based on my income. I don't feel it adds any value at all. So I request this requirement be completely eliminated.