

**Comments from Robert G. Andrews  
Quixtar Independent Business Owner (IBO)  
Concerning Business Opportunity Rule, R511993**

I have been involved in the direct selling industry since 1991. First as an Amway distributor and then as an Independent Business Owner (IBO) with Quixtar.com. During that time period I have reviewed several other Multi-level Marketing (MLM) business opportunities. Additionally, since 1986 I have operated a successful sales operation in the credit card processing industry. Prior to getting involved in professional sales, I spent 20 years in the U.S. Air Force and retired as a Lieutenant Colonel.

Having reviewed your proposed rule R511993, I am compelled to comment on some aspects of your proposal:

1. The requirement for a 7-day waiting period before a potential IBO can register is preposterous. **Are you trying to tell us that grow men and women in America are not capable of making a good decision without thinking about it for 7 days?** Furthermore, I often drive many hours to meet with prospects to discuss becoming an IBO. To require that I then drive home and wait 7 days before asking if they ready to take advantage of the opportunity is unrealistic and absurd. Besides that, during that 7 day period they will surely discuss the opportunity with friends and family, some of whom may also be IBOs who have not reached out to this person. Knowing that the friend or family member is considering becoming an IBO, they will then encourage them to become a part of their business and not mine. I will have done all the work and someone else who was unwilling to offer the opportunity to their friend will reap the rewards of my work. It has been my experience that people seeking an opportunity of this type will give the process due diligence and will often take several days to make a final decision, but a 7-day waiting period should not be forced on those who are ready to get their business started right away.
2. The requirement to provide a list of 10 other IBOs in the local area is more preposterous than the 7-day waiting period. **There is no segment of the sales industry where sales representative are required to provide their prospects with a list of competitors' sales representatives – not one!** And it is a fact that every person involved in any aspect of MLM is a competitor to every other person involved in MLM whether it is within the same company or another company. Why should this be the only segment of the sales industry to have this requirement? Furthermore, prospects have many opportunities to meet other business owners at professional training functions and opportunity presentation meetings. And like my concern in item 1, providing the names of other IBOs in the prospect's neighborhood is likely to identify a personal friend or family member who is an IBO but has not contacted this person about the business opportunity and then I will have done the work and someone else reaps the reward.
3. The most preposterous requirement in your proposal is the requirement for a list of all litigation for the past 10 years. **Do I now have to be a law clerk in order to become a MLM business owner?** If the sales people in the credit card processing industry had to meet this same requirement they would have to carry around an encyclopedia size set of books to every sales call. What about car sales representatives, how could they possibly ever disclose all of the litigation against their industry? Besides, how would I ever be able to find all of the information and how would the prospect know whether I had all of the information or not? The scammers won't comply with this requirement anyway. No other segment of the sales industry has to comply with this type of requirement, why should MLM have to comply?