

HARLOW & ASSOCIATES

517 Little River Way
Sacramento, CA 95831
jrharlow@gns2000.com

916-760-6035
1-800-792-4252

July 17, 2006

Dear People:

I am writing to comment on the proposed rule making for “Business Opportunity Rule, R511993”, 16CPR Part 437. I am an Independent Business Owner (IBO) affiliated with Quixtar. I have been an IBO for almost eight years in this highly ethical organization that requires that there be full disclosure whenever we offer this incredible business opportunity to others. Should new IBO’s change their minds, our Rules and Code of Conduct require that we buy-back any educational and teaching products they have voluntarily purchased. The corporation will also purchase–back products bought from them.

While I applaud the efforts of the Federal Trade Commission to protect the public from unethical business schemes that defraud, I have concerns about the impact several of the proposed regulations will have on me as a small home-based business owner. They are:

- Requirement that a prospective IBO must wait 7 days after receiving disclosures before they can register. Generally an prospective IBO has received oral information about this business opportunity, been asked to review written materials, listen to CDs, read pamphlets AND meet other members on the Global Net Team before registering. Our responsibility is to have the prospective IBO be fully informed when they decide to become an IBO. New IBO’s are eager to share this business opportunity with friends and family. This delay will affect their income stream as well as me and other members of the Team.
Recommend: Eliminate the waiting period for organizations such as Quixtar where prospects can get their money back if not satisfied.
- Requirement that we make a disclosure for every income claim. We do not claim that everyone will earn a set amount of money. It is always up to the individual IBO and based on the business they choose to build.
Recommendation: Require a simple statement about the average monthly gross income for persons active in their business – similar to what Quixtar currently includes in its printed materials.
- Requirement to provide prospective IBO’s with a list of 10 other IBO’s – including names, addresses, and telephone numbers. This infringes on the privacy of proprietary information about my business associates. Generally prospective IBO’s meet many other IBO’s during meetings, seminars and events before registering to become an IBO. There they can ask an IBO directly about their business experiences as an IBO. Thus proprietary information is voluntarily shared as the responding IBO determines appropriate.
Recommendation: Eliminate the requirement for 10 references
- Requirement to disclose personal financial documents is also an infringement of my personal and proprietary rights.
Recommendation: eliminate this requirement. The FTC and other regulatory agencies can already request this legally during an investigation

Thank you for the opportunity to respond to these proposed regulations. I will follow their progress with great interest and concern as the impact of the requirements I have cited will have a detrimental effect on my business. As a retired registered nurse with a husband who is a retired teacher we need this income from this business to support our living needs and my husband’s in-home-caregiver needs when I am out of the house. He has moderate Alzheimer’s Disease and is unsteady walking.

Sincerely,

Jean Harlow
President, Harlow & Associates