

I am responding to the FTC's proposal on new "Trace Regulation Rule on Business Opportunities," as a business owner working with Britt World Wide and Quixtar for two years running. Our business model is not one based on deceptive, fraudulent tactics but on integrity, honesty, hard work and character. Success is not guaranteed and is earned through diligent effort. Our business model is not a "get rich quick" financial fix. This was clearly explained and understood by me from the start prior to registration and is clearly communicated to all prospects. I agree that prospects need all of the current, factual and credible resources available to study the industry they are considering investing in. I was provided with that very information. I suggest prospects research our company with the FTC, Better Business Bureau, Dunn and Bradstreet, U. S. Chamber of Commerce and look at www.thisbiznow.com prior to registration. I got into business for monetary rewards but didn't expect to have gained wisdom, mentorship, applied successful business principles, attained personal growth and life skills unattainable in a typical corporate business structure. Our business is a multibillion dollar industry, debt free, working with other Fortune 500 conglomerates and by no means should be ranked with the likes of fraudulent scams. To register in business one pays \$150 for a business license and an optional \$125 for training materials and products to use, all of which is fully refundable if the prospect isn't fully satisfied.

I oppose a waiting period for prospects before they would be able to conduct business. That idea violates the Free Enterprise principal that this country was founded upon. Should McDonalds be mandated that after erecting a franchise they wait a week before they can open up their doors for business? They would lose thousands of dollars in revenue. Our business carries the same credibility and reputation and would stand to lose major profits. I could stand to lose personal business credibility, trust and money with my clients, customers and potential business partners. Such a rule would promote suspicion and distrust. Eliminate the waiting period at least for business like Quixtar where a prospect can be fully refunded of their investment if they aren't fully satisfied.

I oppose providing a list of "references" to prospects. Such a measure would imply that our business lacked its established credibility. How other IBO's choose to conduct their business in terms of integrity, character and honesty I can't control. I can and do conduct mine with those principles, even to the extent of considering the caliber and character of the people I chose to work with. The business partners in my team had to prove their credibility, work ethic, and integrity, not visa versa. To disclose another business owner's references to a prospect whom I don't know is unfair, unwise and on the flip side violates the credibility I have with my prospect. Prospects in our business have ongoing exposure to the training team where they can ask questions, meet other successful business owners, build relationships, and learn about how the business runs. It's nobody's business to have my personal contact information. That is an infringement of my privacy and makes me feel unsafe, as a single woman. I agree with the Commission that a disclosure of references is essential –credible resources, as listed above.

I oppose providing a "litigation list" to future prospects. Ask Microsoft or another big conglomerate to do this. After they regain their composure, the corporation would have reams upon reams of paperwork to report. And what prospect is going to read through that? All they would see is a stack of paper that screams how "bad" Microsoft is, without providing the material information necessary to make an informed investment decision. Does Nike have litigations – substantiated and unsubstantiated? You bet! Tiger Woods didn't need to know that litigation history of Nike before negotiating an endorsement contract. Through Quixtar, we provide a detailed prospectus to satisfy this need. Eliminate the requirement to disclose past litigation.

I oppose making a different disclosure for every income claim. I share with prospects exactly what the approved FTC model says as laid out in our prospectus and presentation flip chart. Additional details would be confusing and provide little meaning to the overall business. We show them exactly how the money is earned, as written. To require a separate disclosure for every example I used in explaining the income potential would be time consuming and leave the prospect with the idea that success is difficult and unattainable. If disclosures are needed then a standard, easily understood disclosure like, "average monthly gross profit for 'active' IBOs would be best.

I oppose being required to provide prospects with personal financial documents to substantiate any income claim. It's inappropriate. This rule could potentially damage new IBOs or anyone in business who is just starting out and isn't making a large profit yet as it would appear that, incubation or learning and growing notwithstanding, money isn't being made in our business. It could also suggest that that particular business owner isn't successful when time and effort would say otherwise. Name another multibillion dollar business where the CEO of the company must disclose their financial statement. IBOs should possess substantiation for any claim but should only be required to disclose it during an investigation and not as a general business practice.

Perhaps the Commission would consider contacting our affiliate companies' CEO's like Circuit City or Barnes and Noble to express what earnings or losses would be jeopardized should these rulings be mandatory.

Thank you for your consideration. M Brady, North Carolina