

July 17, 2006

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

RE: Proposed Business Opportunity Rule, R511933

Dear FTC Commissioners:

My name is Bob Martufi. I am an independent business owner with Primerica Financial Services.

I was working in the construction business in 1982 when my cousin introduced me to the business. I wasn't sure that I could do it. It was so different than anything I had done and I was scared to even try. With my doubts, the seven day requirement might as well have been a seven year wait period. I would have said, NO WAY. I wouldn't have even thought about it. Well, I said no at first. But it stayed with me and one year later, when I realized how much money my kids would need for college and all the other expenses that were coming up, I decided to join. I began part-time on April 11, 1983. In just one year, my part-time income surpassed my full-time income. I quit my job and decided to work full-time with Primerica.

I am so thankful that I have had this opportunity. I was able to pay for private high school and college for my kids. They didn't have to worry about student loans or have to work. I fully paid for a spectacular wedding for my daughter and split the cost for my son's wedding. We could afford for my wife to quit the job she hated. I have sent our parents on dream vacations and have afforded any costs that have arisen as a result of one parent's Alzheimer's and another's stay in a skilled care facility. Most importantly, we have the flexibility to be there for our parents without having to worry about having enough vacation or sick days at work. We host and participate in a number of charities, including a golf tournament we host in my dad's memory. Thanks to the Primerica opportunity, I have taken care of my family, given back to my community and am financially independent.

Here are some reasons why the proposed business opportunity rule will literally destroy our business:

1. Nobody will join our business when they learn there is government mandated waiting period before they can join. For those who will not be immediately scared and turned off by this requirement, others will, after thinking about it for seven days, realize that there's no way their own business could grow with this restriction and will decide not to join.

2. I believe the reference requirement is an invasion of privacy. With the thousands of people who are recruited each month, can you imagine how many individuals the names and numbers of references would be distributed to and how many phone calls would be placed? Even

though I love this opportunity and can only say positive things about it, I would hate to be a reference and subject to all sorts of calls at all hours of the night. Having waived my Do Not Call rights by permitting the use of my name and telephone number, I could get calls at 11 pm or as early as 6 am, during Thanksgiving dinner or on Christmas day. I don't want my name and number distributed to thousands of people. Would you? And who, in their right mind, would list the names and numbers of people who will have anything bad to say?

3. If the seven days doesn't convince somebody not to join, the disclosure document certainly will. Primerica is a subsidiary of the largest financial services company in the world, Citigroup. The rule will require us to disclose litigation for all 3000 of our affiliates. What has that got to do with Primerica? All it will do is add an additional burden to a young business owner who already has a great deal of responsibility. The anticipated size of the document will probably be over 400 pages long. The printing costs alone would drive representatives out of business.

The FTC certainly has honorable intentions and nobody wants to see the scammers put out of business more than me. But certainly there's a way to draft this rule so that hard-working, trustworthy, professional and legitimate business owners like myself are not the ones put out of business. I plea to the Commission to strike a balance between punishing the wrongdoers and protecting those who are not the problem.

Thank you,

Bob Martufi