

Dear Sir or Madam:

This letter is regarding Business Opportunity Rule, **CFR Citation:** 16 CFR Part 437
Published: April 12, 2006.

I am writing to let you know that some of the proposed rules would severely impact my Quixtar business in a negative way. I have been an Independent Business Owner (IBO) with Quixtar for approximately 7 years now. I have found the opportunity to be a very fair and fulfilling opportunity. I work as a telecommunications engineer and I build my business during my spare time. I attribute a good amount of my overall success so far in life as a result of my Quixtar business and my affiliation with my Quixtar business partners. I have accomplished significant personal & financial goals over the past 7 years. One of the most significant accomplishments has been that I am debt free. I also know how to better manage my finances due to my mentorship via the Quixtar opportunity.

Now, I have not accomplished all the goals that I set out to accomplish through the Quixtar business, but this is only due to my own lack of effort. I know many people who have accomplished a lot more than me and I know many people who have accomplished a lot less than me through this business. Anyone, who is aware of the world, knows that there are no guarantees in business or life for that matter. Which is why I am concerned about the proposal. Although, I know we are trying to prevent fraud, the manner in which we are proposing to do so will hurt legitimate businesses. First of all, it seems like we are trying to guarantee the prospect a certain level of success by disclosing personal income, delaying their registration for 7 days, and require a list of all prospects in the area.

These are not reasonable requirements to say the least. First of all, personal income is a private matter. Anyone, who has ever run a business explain that income is not guaranteed and in the first couple of years all the money that is made is reinvested in the business. I personally think it is way off the mark to require personal income disclosures. My employer does not do that for me and all the people that I work with. Neither does my boss disclose his income to me, neither does my accountant, my banker, etc. It is definitely a violation of my privacy.

Once again, just because I may make \$10,000 in a month does not mean that the prospect will make that. However, that is certainly available. I and all of my associates always explain to prospects that this business cost about \$250 to get registered. We always let them know that \$100 of that registration is for products that get sent to them and that another \$100 goes to an education pack, and the last \$50 or so dollars is for the registration fee. We always explain that they are **guaranteed** nothing but the opportunity to succeed and that it lies in their own hands. We always explain that this is not a get rich quick scheme. And if it was, the company could not possibly be in business for nearly 50 years and be a multibillion dollar business. I believe that is fair, because that is the whole foundation of the American economic system call free enterprise.

The 7 day wait period is completely unnecessary. No one is ever forced to register. No one is ever threatened with a gun to register. In this day and age when the internet is so readily available for anyone to do research, I think people are more than capable of making informed decisions. The only problem is that they need to sort through the valid information and the “garbage” that is all over the internet. If we were to require people to wait 7 days, then they should also be required to wait seven days before they buy a new or used car. This would significantly harm my business, because when people are presented with the information in a professional and up front manner they usually get excited about the business; however, as time passes life gets in the way and people forget about the things that excited them yesterday. This would also affect the prospects negatively. For example, if someone goes to a motivational seminar they come out ready to conquer the world because they have belief in themselves. However, if they were told that they had to now wait 7 days before they started applying the principles they learned, almost no one would make any changes.

Another issue I want to address is the requirement to provide a list of references. Prospects get an opportunity to meet local IBOs at the weekly meetings we provide. Providing a list of names and addresses would violate other IBOs privacy. Also, it would affect my business if my prospect calls another IBO and that IBO convinces the prospect to register with them. Another point is that the IBOs that are local to me may not have achieved any level of success. Personally, if I want to be a doctor, I talk to doctors not people who have not become doctors and certainly not people who dropped out of medical school.

The last issue I want to address is the disclosure of all litigation. To me this is completely absurd. If we are trying to make a fair market place for everyone, then everytime I shop at Wal-Mart, I should get a list of all their lawsuits that have been filed against them. I should also get a list of all litigation against the phone company every time I switch carriers, etc. Once again, although the purpose of the rules is to minimize fraud, it seems that the rules assume that people are mindless, incompetent lemmings incapable of intelligently analyzing a legitimate business. Why then do we have the Better Business Bureau? In this day and age where society is very litigious, many lawsuits are dismissed or found to be frivolous.

I, as well as the rest of the IBOs, want a fair marketplace and the reduction of scams and schemes. Illegitimate businesses that try to mimic our model make building our business more difficult. It places a bad aura on network marketing type businesses. However, some of the rules that the FTC is proposing would make it even harder for us to build a legitimate business. It would make it nearly impossible to build a successful business with fast growth. Although, the rules are being designed to help society on the whole, it would severely punish legitimate businesses like Quixtar, Primerica, Market America, etc. while trying to reduce fraud. I personally don't think that is a fair way to accomplish our goal. The best way is to give prospects the freedom to intelligently analyze business opportunities and to educate people on how to analyze businesses.

I ask that you seriously consider my comments and concerns when analyzing the proposed rules. Thanks you.

Sincerely,

Dev Dharamdeo