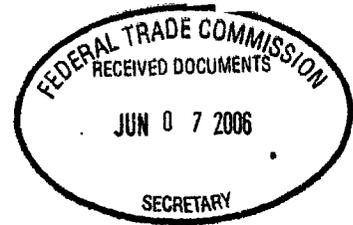


June 1, 2006

Office of the Secretary, Room H-135 (Annex W)
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580



RE: In Opposition to Business Opportunity Rule R511993

Dear Secretary:

Regal Ware is opposed to the proposed New Business Opportunity Rule R511993 because it could severely injure Regal Ware and other direct selling companies. Regal Ware was founded by my grandfather in 1945 as a manufacturer and marketer of cookware, water filters, and other health and nutrition products sold primarily through direct sales channels. Since 1945, Regal Ware has grown to be a world leader, and remains one of the last manufacturers of cookware in the United States with thousands of independent distributors and sales consultants operating around the globe.

The most burdensome section of the proposed rule is the seven (7) day waiting period to enroll new distributors and sales consultants. Regal Ware's sales kit is normally provided free of charge or at a nominal cost. This waiting period breeds skepticism by creating the impression that there might be something wrong with Regal Ware's sales plan. The related administrative costs and record keeping will be very expensive.

The proposed rule also calls for the release of any information regarding prior civil or criminal litigation involving misrepresentation, or unfair or deceptive practices. Regal Ware sees little value in disclosing these lawsuits unless the judgment was adverse. Otherwise, Regal Ware is put at an unfair advantage even though it did nothing wrong. It also seems appropriate to include only adverse judgments related to the earning opportunity offered to the prospective distributor.

The proposed rule also requires direct sellers to gather information such as time periods, demographics, and earnings claims for its independent sales people. Regal Ware is concerned that this approach will be ineffective to prevent the targeted fraud because those perpetuating fraudulent business opportunities will not provide accurate data.

Lastly, the proposed rule requires the disclosure of a minimum of ten (10) prior purchasers nearest to the prospective purchaser. Regal Ware is uncomfortable giving out the personal information of individuals, without their approval, to strangers because of the possibility of identity theft. Also, giving out this information without any controls on how it could be used will very likely benefit Regal Ware's competitors.

Regal Ware opposes this proposed rule because it has many unintended consequences that may destroy its business and because there are less burdensome alternatives available to achieve the FTC's consumer protection goals. Thank you for your time and consideration.

Sincerely,

Jeffrey A. Reigle
President & CEO

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