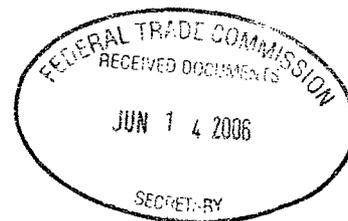


RICK LELCHUK
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ORIGINAL

522418-70086

June 7, 2006



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

RE: Business Opportunity Rule, R511993

Dear Sir or Madam

There is great concern in my community about the proposed Business Opportunity Rule R511993. In its present form, it could prevent me from continuing as a Mannatech Distributor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule would make it very difficult if not impossible to sell Mannatech products and develop a business.

Typically, a person buys our products because of the health benefits and not because he or she wishes to sell products. Most clients become a distributor for the cost savings, not necessarily to be in business. The seven-day waiting period to enroll a new Distributor is both confusing and burdensome. It is confusing because it gives the impression that there might be something wrong with the product and the plan. It is burdensome because I will need to keep very detailed records of when I first speak to anyone about Mannatech and then have to submit reports to Mannatech headquarters to comply with this restriction.

Additionally, the seven-day waiting period is unnecessary as Mannatech already has a three-day 100% money back cancellation policy for all products.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent, only the fact that a suit was filed. Anyone can be sued by any entity for almost anything. It does not make sense to have to disclose these lawsuits unless a party was found guilty. Again, the impression is that there is something wrong with us and our company. We are put at an unfair advantage even though no one has done anything wrong. What other industry has to disclose its lawsuits before you buy?

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. We are always glad to provide references if asked, but, in this day of identity theft, I am very uncomfortable giving out the personal information of my clients to strangers. Giving away this information could damage the business relationship of my customer list. It would be an additional and unnecessary encumbrance of business to have to provide this information.

People will be reluctant to become a client with the following required sentence included in the sign-up process -"If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." Surely, you would not want your personal information disclosed to any seemingly interested stranger? People are, rightfully so, very concerned about their privacy and identity theft and this measure might be a contributing factor to this menace.

I am taking Mannatech's products because they supply me with nutrients that are not readily available in the modern food supply. Originally, I became a distributor for Mannatech because being a distributor offers the best price plan. In the short time I have taken the products I have become healthier and plan to share this with others and develop a business.

I urge you not to throw unnecessary road blocks in the path that many have chosen to follow. When the business plan is offered a prospective client is not required to maintain an inventory, there are no special fees to get into the business and this proposed rule would be unreasonable, unfair and unnecessary.

We all appreciate the work of the FTC to protect consumers, but this proposed new rule has vast unintended negative consequences. I urge you to consider a less burdensome alternative in achieving these goals.

Thank you for your time and consideration.

Sincerely

A large black rectangular redaction box covers the signature and name of the sender.