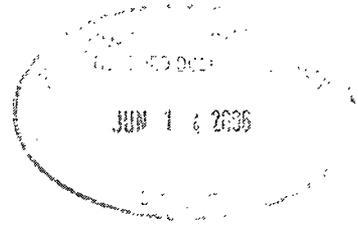


522418-70088

From: Myron R. Hurlbut
Glycoliving LLC

[REDACTED]
[REDACTED]
[REDACTED]

Email:



To: Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Subject: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Mannatech Company Associate. 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 will make it very difficult, if not impossible, for me to educate people and sell Mannatech products.

My wife and I have been Mannatech Associates for more than 12 years. Originally, my wife began using the Mannatech products because she liked them and when we saw their benefit, we began to build a business to earn some additional money. During the ensuing years, our business has grown significantly to become the primary source of retirement income and provide a comfortable life style. In fact, this has lead to a new and very meaningful career rather than "retirement", involving educating people about the benefits of the Mannatech products and supporting their work in building their own businesses. The Mannatech income is allowing us to travel, provide for our grandchildren's education now and in the future, and significantly increasing our charitable giving to supporting missionary work around the world.

One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new associates. Mannatech's sales kit only costs about \$100. People buy TVs, cars, and other items that cost much more than that and they do not have to wait seven-days. This waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary, because Mannatech already has a 90% buyback policy for all products including sales kits purchased by an associate within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Mannatech and will then have to send in many reports to Mannatech headquarters. This is further complicated by the fact that much of our business is done by long distance phone or internet contacts with the products being shipped direct from Mannatech. It looks like we would need to delay the placement of orders with

Mannatech until after the seven days, thus making it about two weeks before a new customer could receive the products.

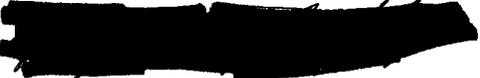
The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. Otherwise, Mannatech and I are put at an unfair advantage even though Mannatech has done **nothing** wrong. It looks like a presumption of guilt rather than a presumption of innocence.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references for my self, but in this day of identity theft and concerns about privacy, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Mannatech headquarters and then wait for the list, because the 10 prior purchasers are probably unknown to me as they may have been contacted by friends in other locations or even countries. It should also be noted that the 10 prior purchasers know the least about the products, having the least experience, so are not in a position to evaluate them. I also think the following sentence required by the proposed rule will prevent many people from wanting to register as a salesperson "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met. This kind of personal information disclosure is not required even for the purchase of a house or a car, let alone a \$100 sales kit. It also raises questions about "sales kit" versus "product kit". In our experience a majority of the people initially just wants the products and have no intention of selling them and building a business, but for a few, when they see the results from using the products, they begin to share with friends though in their mind still not intending to "sell". At which point in this process would a person have to be considered to be selling an "opportunity"? This is just impractical to administer.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,


Myfon R. Hurlbut