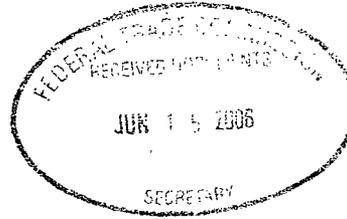


522418-70099

Christy Krusac



June 13, 2006

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

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

The purpose of my writing this letter is to express concern regarding Business Opportunity Rule R511993, which is being proposed to remedy "unfair and deceptive acts or practices" of certain kinds of sales plans. While I understand that the goal of this rule is to protect the public, I also feel that it could affect, or even prevent me from being able to pursue my business as a Mannatech Associate.

The FTC has a huge job in preventing customer abuses in the marketplace, however, some of the provisions in the proposed rule will burden my business with unnecessary requirements, one of which will very probably drive away customers by instilling unfounded fears. I refer specifically to the provision that requires disclosure of past or present lawsuits, even lawsuits in which my company was found innocent. If the courts ruled "not guilty", than I do not feel I must burden my customers with the task of trying the case again. When I purchase items in retail outlets, I have never been given litigation information involving that store, to consider before I go to the cashier. Therefore, I wholeheartedly oppose this provision because it assumes that Mannatech and I are guilty, when the courts ruled otherwise.

I also oppose the seven-day waiting period provision. When I bought my most recent car, I signed on the dotted line within two hours of walking into the dealership. I made a choice and put my money down. All of us make expensive purchases without the burden of having to wait seven days to take it home or have it delivered. The waiting period implies that something is wrong with me or my company, even though Mannatech already protects the new associate or member with a 90% buyback policy for sales kits and products purchased in the last twelve months. This waiting period provision adds the burden of unnecessary paperwork and documenting conversations, which then must be sent to Mannatech's home office. Federally-mandated documentation is already one of the huge burdens that small-business entrepreneurs of all kinds have to bear. Instead of helping small businesses become robust contributors to the economy, the burden of unnecessary record-keeping and administrative duties result in "going out of business" signs being posted at a discouraging rate. My time is already limited to do my business, and I'm getting older, so it takes me longer also. Please consider the negative and exhausting impact that this will have on the small business owner who has no secretary or staff to do the extra work.

The proposed rule also requires the release of personal and identifying information about 10 prior customers to a prospective new customer or associate. If I were one of those 10 prior customers, I would not want my name, address, or phone number given out to a complete stranger, who could use it for identification-theft purposes, among other things. In addition, Mannatech is growing at a very rapid rate, and the burden of our headquarters in supplying 10 references for every new customer would slow down the other necessary corporate administrative work that other associates and I need to carry on the functions of our businesses. The disclosure that a new customer's contact information can be released in the future to other customers would be a huge reason not to purchase or become a salesperson. I have never heard of other types of businesses that are required to reveal customer identities to other customers.

I have been a Mannatech Associate since January of this year, after I learned about the health benefits of taking the products on a regular basis. My husband and I and our grown children have experienced improved health conditions and we are very grateful for the opportunity to share the products with others. I retired from public school teaching last May, after the No Child Left Behind Act documentation paperwork combined with local and state paperwork requirements took away the remainder of the joy of teaching, as I was continually exhausted and stressed. Since our income was cut in half, I rely on my Mannatech income to begin to make up my former teaching salary. This is occurring at a steadily increasing rate, for which I'm thankful. My customers are using the products and no one has complained about the business practices or policies. In fact, some folks in my organization are beginning to see Mannatech's compensation plan as a possible income source for their futures.

Thank you very much for considering my letter. The work of the FTC is necessary, however I believe that this proposed rule, while intending to prevent fraud, would in effect, be restrictive and prohibitive to the free exercise of a validated and proven marketing system. I support looking for alternatives methods to achieve the goals of the FTC.

Sincerely,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Christy Krusac