

June 6, 2006
Alicja Nova

522418-70100

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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:

I am writing this letter because I am very concerned about the proposed Business Opportunity Rule R511993. I believe that the way this proposal is written in its present form, could prevent me from continuing as a Mannatech Distributor. I appreciate and understand that the role 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 sell Mannatech products.

One of the sections discusses a seven-day waiting period to enroll new Distributors; this becomes not only confusing but arduous in nature. Mannatech's product packs are very reasonable ranging from \$99 to only \$1099. The average person buys Mannatech product packs to save money, not because they have a desire to sell Mannatech products. People today purchase computers, cars, various health products from television advertisements as well as off the internet, which can be even more costly and they do not have to wait seven days. The "waiting period" proposed gives the impression that there might be something wrong with the products or plan. Mannatech already provides a three-day, 100% money back cancellation policy for all products packs, so this seven day waiting period is unnecessary. Plus this "waiting period" requirement would put me in the position to keep very detailed records, not only when I first speak to someone about Mannatech, but then I will have to send all kinds of reports to Mannatech headquarters.

Regarding the proposal about lawsuits involving misrepresentation, or unfair or deceptive practices, it requests that I include a release of this information. However, if the company is found innocent, this doesn't matter, I would still have to include a release of this information. Today, anyone or any company can be sued for almost anything; our society has become focused on suing others to earn an income. So it does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. The way it appears is Mannatech and I are put at an unfair advantage even though Mannatech has done nothing wrong.

Lastly, the proposed rule also requires a disclosure of at least 10 prior purchasers nearest to the prospective purchaser. I'm glad to provide references or create a 3-way conversation to help someone learn more about our program, however, today we are

dealing with identity theft. I am uncomfortable sharing personal information of individuals (without their consent) to strangers. Secondly, by giving personal information this could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. Another thing that may become an issue, this of course depends on the prospective buyer, but giving names of prior purchasers to them would allow them access into my customer base. Thirdly, in order for me to get a list of "10 prior purchasers" I would first have to send the address of the prospective purchaser to Mannatech headquarters, then I would have to wait for the list to come to me. Lastly, I think the following sentence required by the proposed rule will deter many people from wanting to become a Mannatech Distributor "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People, including myself, are very concerned about identity theft and want to retain their privacy; they are reluctant to share their personal information with people they have never met.

I have been thrilled to be a Mannatech Distributor for more than three years now. I started buying the products because they supplied me with nutrients that are missing from the modern food supply. I became a distributor because it offered the best price to buy the products not because I wanted to sell them. At some point I chose to share the information about the products because I became healthier when taking them. Now, I and my family depend on the extra income, which is part of our budget. My story is not much different from many, many Mannatech Distributors who started taking the Mannatech products for the health benefits and as a result, chose to share it with others too. These new proposed rules may be too broad for the people who are already conducting their business in an efficacious and ethical manner such as Mannatech.

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 very much for you time in considering my comments and concerns.

Sincerely,



Alicja Nova, CNWC