



Peggy Ann Kralik
Vibrant Health Center

522418-70101

June 20, 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 proposed Business Opportunity Rule R511993 has just come to my attention, and I am really concerned about what could happen to my business should this rule pass. I am a Wellness Consultant, and an authorized representative with Mannatech, Inc., a seasoned nutraceutical research and development company that utilizes network marketing to distribute, and educate customers about its nutritional products. I'm sure 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 prohibit my ability to continue to offer Mannatech products to my customers and clients.

First of all, making my customers and clients have to wait for seven days to get these safe dietary supplements not only casts a negative light on the direct selling industry – unless you plan to do the same thing with these type products off the shelves of the grocery stores – it also makes it very cumbersome for the very people the FTC is trying to protect. This unnecessary delay also creates time-consuming administrative and record keeping problems. I have been telling my customers and clients about these supplements for nine years now, and sold my prior business to do this full time, because it actually benefits people. Now that it is my main source of income, it would have a very negative affect on my household finances. During the past nine years I've also had the opportunity to create close, lasting relationships with some of my customers and clients, and ingredient that was missing from my former career as a real estate appraiser.

Additionally, I believe it is unfair to not distinguish between winning and losing lawsuits under the litigation reporting area of the proposed rule. Mannatech is publicly traded (NASDAQ ticker symbol MTEX) and as such, is a target for lawsuits in this lawsuit-happy society. Making us disclose any lawsuits filed against the company puts me at a disadvantage, because whether or not the lawsuit has merit, and whether or not the lawsuit was dropped or dismissed, it shines a bad light on me and the company, even though we have done nothing wrong.

And last, but not least, part of the proposed rule requires disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. This presents a problem with privacy issues and the possibility of identity theft as well as other safety issues. I'm sure my customers and clients would not feel good about their personal information being given out to strangers. Then to say: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" to someone who would like to tell other people about these dietary supplements would most likely deter most people from proceeding. What a shame that would be. I understand that there are fraudulent and unethical groups in this industry, but this proposed rule would also unfairly target those which are legitimate, like ours. I feel certain that the FTC can propose rules that will be less burdensome in achieving its goals.

Thank you for your time and consideration,

Respectfully,


Peggy Ann Kralik
CC: Senators Carl Levin and Debbie Stabenow