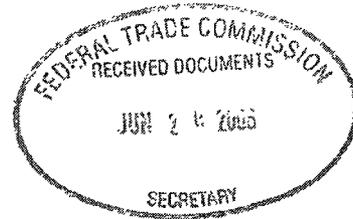


Dr Daniel Fouts
Glycomics Health International

522418-70115



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:

I am very concerned about the proposed Business Opportunity Rule R511993.

Before I detail the reasons for my concern let me ask a question. How much will the FTC's budget need to increase to hire the additional manpower needed to monitor implementation and compliance with the unbelievable amount of paperwork the proposed rules will create?

Now to my concerns:

First, because BOR R511993 literally is an insult to the adult population of the United States indicating that we are so ignorant and naïve that we must have federal government protection in order to evaluate information regarding a potential business opportunity. A sad commentary for the alleged "land of opportunity".

Second, I believe that in its present form, it could prevent me from continuing my full time business as a Mannatech Associate. The FTC's mandate to protect the public from "unfair and deceptive acts or practices," I understand. However, some of the sections in the proposed rule will make it very difficult if not impossible for anyone in the direct sells business to stay in business as in my own case of selling Mannatech products.

Third, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. This is totally unsatisfactory. While I encourage every individual to share Mannatech's technology with others, YOU must understand that particularly with any company selling nutrition related products, some individuals taking the products for their health challenges will NOT want any details of that information or their identity released to other individuals. I don't even want to think about the potential lawsuits over privacy rights that this proposed rule could bring about. I hope the FTC doesn't either. In addition, 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. The really senseless part of the Rule is that it totally overlooks the fact that the majority (around 80%) of the people in direct sales join just to be able to purchase the products or services at wholesale prices – NOT TO DO A BUSINESS OR BECOME A SALESPERSON. Thus, the following sentence required by the proposed rule will prevent many people from wanting to sign up 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, especially since they didn't want to be a salesman in the first place.

Fourth, the seven day waiting period to enroll new associates is ridiculous, confusing and unbelievably burdensome.. Waiting Period - we are not talking selling guns here. As a doctor I can unequivocally state the waiting period could be detrimental to someone's health to further postpone potentially beneficial access to

state of the art nutrition in the form of Mannatech's patented technology. Mannatech's sales kit costs as little as \$39. People spend more than that at WalMart everyday. 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 a salesperson 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's corporate headquarters.

Fifth, 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. The Wall Street Journal just ran an article about the many Fortune 500 companies being targeted by unscrupulous law firms in class action suits alleging wrong doing because of stock market price fluctuation. It does not make sense to me that I would have to disclose these lawsuits unless in my case Mannatech is found guilty. Otherwise, Mannatech and I are put at an unfair advantage even though Mannatech has done nothing wrong.

I have been involved with the direct sales industry in a number of companies for over 20 years. I did not need any of the proposed FTC rules during the course of the 20 years to evaluate either the benefits or the risks involved in the companies I associated with. I have been a Mannatech Associate for over 10 years now. I now derive my full income as a Mannatech associate. I also have received immeasurable pleasure in helping positively effect the health and financial lives of literally thousands of others. I appreciate your concerns and Mandate to protect consumers. The legislation proposed will however, literally cripple an entire industry whose primary benefit has been to give hope to millions of individuals who didn't have the education, funds or other opportunity to so radically improve their lives as what the direct sells industry provides. Interesting that the direct sales industry produces more millionaires than any other type of industry – that, I assure you will come to a screeching halt if Business Opportunity Rule R511993 becomes law.

Thank you for your time in considering my comments.
Sincerely,


Dr Daniel Fouts