

Alex Hoover
Hoover Group

522418-70128



June 1, 2006

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Ave, NW
Washington, D.C. 20580

RE: Business Opportunity Rule, R511993

Dear Sir:

I am concerned about the proposed Business Opportunity Rule R511993. As it is written it could affect my business adversely. I am an associate with Mannatech, which is a direct selling company with the highest possible integrity. Although I understand your duty to protect the public from unfair and deceptive practices, some of the sections in this proposed rule will make it difficult if not impossible for me to sell Mannatech products.

Our products are life saving, and when a person understands how they work, they do not want to wait seven days to get started. Seven days could make it too late for them if they have a life threatening disease. This seven day waiting period is unreasonable to require for a food supplement. This waiting period implies some sinister possibilities in our products. We already have a 90% buy-back policy for all products, including sales kits purchased by a salesperson within the last twelve months. The paper work required by R511993 would be nearly impossible for an independent associate like me, who works from my home. In addition to that, that requirement will deter new associates from being attracted to my business. Who would want to sign up for such a burden?

In addition to the paper work burden, you are requiring disclosure of all lawsuits, whether guilty or not. In this day of frivolous litigation, that seems unfair if the company or individual is not guilty. And to require disclosure of 10 or more prior purchasers would be contrary to the privacy laws. With identity theft rampant, I am uncomfortable with giving out personal information to other companies about someone without their knowledge and approval. It would put my business on hold while I waited for some assistant to get the list together to supply me with the required purchasers. I have difficulty now in getting Social Security Numbers from prospects. If they understood that information would be sent to other companies, it would stop many from enrolling in my business.

Our business sales kit costs \$1099, but it contains \$1400 worth of product, or a one-year supply for one person. To change that cost to under \$500 would require a complete revamp of our compensation plan, and would not supply the person with enough product to effect a cellular change.

I have been in Mannatech for almost two years. I am a senior citizen and dependent upon the income earned by my Mannatech business. Social Security is inadequate for my wife and me to make our house payments and live. We served as missionaries during prime earning years, and so have no pension funds to supplement.

I understand your work to protect consumers, but this new rule, in my opinion, has many unintended consequences for home-based, direct sellers, such as me. Please seek less burdensome alternatives to achieve your goals.

Thank you for your time and consideration of my comments.

Sincerely,

A large black rectangular redaction box covering the signature of Alex Hoover.

Alex Hoover
Independent associate for Mannatech