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Kaleb Genstler
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June 9, 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 Commissioners:

I am writing to request that the Commission discontinue further consideration of Rule 511993, regarding Business Opportunities. As proposed, the provisions are excessive and unfair.

For the last three years our family has been involved in the Mannatech opportunity due to the profound help that my mother received with her very serious health problem.

Like virtually all other Mannatech associates, she first registered merely to buy the products at wholesale for my very serious autoimmune health problem. After months of use and much improvement in her health, she decided that the business opportunity was worth pursuing. In the mean time, she utilized the compensation plan to bring some money back in to help cover the cost of our own products. This is the typical path in Mannatech for most people.

The provisions of this Rule 511993 are unnecessary to protect the public and would have profound adverse impact on our ability to help people with their health issues by supporting their nutrition, and by also being able to help them afford their products thru participation in the compensation plan.

The 7-day waiting requirement is unnecessary because anyone has the right to terminate their account at any time and to return products. If such a requirement is necessary here it should also be imposed for buying cars, houses, and any other item of more than \$100 in value. Also, in many cases people wish to have their products expedited to them for health reasons. The proposed rule would infringe on people's right to make their first purchases in a timely manner. It would further create unreasonable problems with record keeping and administrative costs related thereto.

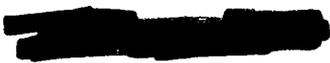
The requirement to report all litigation against the company to any prospective associate is also unreasonable. Frivolous and vexatious lawsuits are filed constantly. It is patently unreasonable to require such reporting in the context of sales. Anyone wishing to know such data can easily look on the internet to find it out. Why should direct sale companies be subject to requirements that are so far from what is required from sales in any other context?

Of most concern in the proposed rule is the requirement that names and contact information of other associates be disclosed to anyone, prospective customer or not. If any provision is ripe for abuse it would be this one. Every crook in town could start to pose as one interested in an opportunity or a product and start taking the names of the people disclosed to use for who-knows-what nefarious purpose.

We understand that the FTC is charged with protecting the public from fraudulent practices. But this rule is ill conceived, and goes so far beyond reasonable measures toward that goal that it should be abandoned. It is not reasonable to impose burdens on one business model that are so disproportionately burdensome in comparison to virtually every other business mechanism.

While dishonest persons can and do become involved in Mannatech, this is true for every other line of business or profession. Please redirect the agency's efforts toward more effective measures that are appropriate in regard to the vast majority of honest, hard-working people.

Sincerely,


Kaleb Genstler,
