

ORIGINAL

JeTMAR, Inc.

[REDACTED]

522418-70149



June 2, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir or Madam,

I am sending this letter because I am concerned about the proposed Business Opportunity Rule R511993. In its present form it could prevent me from continuing with my business as a Mannatech Associate. I understand part of the FTC's responsibility is to protect the public from unfair and/or deceptive business practices, but some of your proposed rule will make it difficult, if not impossible, for me to continue in business, which I'm sure is not the intent of the rule.

I am particularly opposed to the seven-day waiting period, a confusing and burdensome section of the proposed rule. The waiting period is unnecessary. The cost of a sales kit to enroll a new Associate is minimal. People purchase cars, appliances and other items costing much more and they are not required to wait seven days. Further, the waiting period gives the impression there may be something wrong with the purchase plan, which is false. Mannatech (and we as a Mannatech Associate) already have a 90% buyback policy for all products including a sales kit purchased by any salesperson within the prior 12 months. This rule would cause me to have to keep detailed records about everyone I talk with about Mannatech products and send in many detailed reports to Mannatech headquarters. This is not only not cost effective, it would eat up what extra income I now earn.

Another objection I have to the proposed rule is the requirement to release information about lawsuits involving misrepresentation or unfair or deceptive practices. I can understand doing this if a company was found guilty of wrongdoing, but the rule does not specify this. A company can be sued for just about anything today, yet may be found innocent. The rule should not require disclosure of a lawsuit in which a company is found innocent. To do otherwise would only serve to penalize without cause.

I have been a Mannatech Associate for over two years and became one because the products are excellent, have helped me and my family, and because I wanted to earn some extra income. Now we all rely on the income to supplement our budget. It would put undue hardship on us to have to comply with this rule as proposed.

I do appreciate the work the FTC does to protect consumers, but I believe this rule, as proposed, has many unintended bad consequences. There must be less burdensome alternatives available to you in achieving the intended goals of this rule. I hope you will explore and adopt these alternatives. Thank you for your time in considering my comments.

Sincerely,

[REDACTED]

Donna Casselman
President/Owner