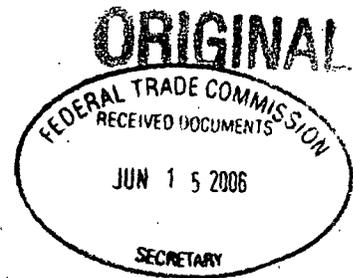




522418-70396

June 14, 2006



Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R5M993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: NPR
Business Opportunity Rule, R511993

Dear Sir or Madam:

We strongly oppose Business Opportunity Rule R511993. In its present form, it could prevent our Company from continuing as a direct selling company.

One of the most confusing and burdensome sections of the proposed rule is the 7-day waiting period to enroll new Distributors. The cost of becoming a GNLD International distributor is nominal. Our products are reasonably priced, and our business does not lend itself to excessive inventory purchasing.

A 7-day waiting period creates a negative characterization of direct selling companies. As a member of the Direct Selling Association, GNLD International, LLC has a 90% buyback policy for all products sold by the Company, including sales kits purchased by a salesperson within the last twelve months.

A 7-day waiting period is unnecessary to the protection of consumers and sales distributors. Rule R511993 will create great expense for companies, and will not provide any new benefit to consumers. It must be noted that no such 7-day waiting period is required of companies that compete with direct sellers in the American market place. Unequal treatment will create litigation and uncertainty for years to come.

There is no legitimate government purpose in placing direct selling companies at the competitive disadvantage proposed by rule R511993.

The proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. That requirement is an outrageous demand to diminish a company's value. Customer lists and distributor membership information are confidential and constitute trade secrets that are closely protected intellectual property assets throughout the business community.

Each of the 50 states has more than adequate statutory and regulatory authority to protect business opportunity participants. Unfair business practices and fraud are



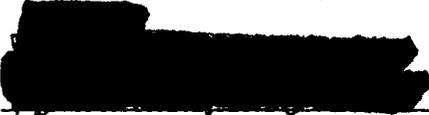
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illegal in all states. Excessive and discriminatory FTC regulation designed to unfairly burden a legitimate sector of American business is unwarranted and unjustified.

Our company has a 48-year history of manufacturing and marketing superior products and promoting free enterprise to American consumers. The respect and honorable reputation we have built is a testament to our business practices and honesty.

Thank you for your time in considering our comments.

GNLD INTERNATIONAL, LLC

By: 

John E. Seibert
Vice President, Legal Services