

*Edward Wolcoski*

June 23, 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

**RE: Business Opportunity Rule, R511993**

Dear Sir/Madam,

I am writing in response to the proposed New Business Opportunity Rule R511993, if not modified, will be a significant impediment and burden to the network marketing industry. This new rule, although well-intended, represents a significant burden to the free market trade.

The proposed rule would require a seven-day waiting period to enroll new distributors. While I support some of the disclosures with modification, I am opposed to a seven-day waiting period because it is excessive burden to a distributor who would be required to document and follow-up on the process hinder new business development.

I support the disclosure of an average earnings income statement because it is a good business practice. However, I oppose being forced to provide written substantiation because it will be burdensome considering the amount of money to enter into the business is nominal.

I would only support the disclosure of previous litigation of companies, executives, affiliated companies and the like involving fraud and misrepresentation only if the party is found guilty. If the defendant is found not guilty, the opposing parties agreed to settle without admission of guilt or the case is still pending, then it should not be necessary to disclose this information.

It is a good practice to provide references of satisfied customers; however, this is a burden for small businesses and, as a requirement, is a violation of personal confidentiality.

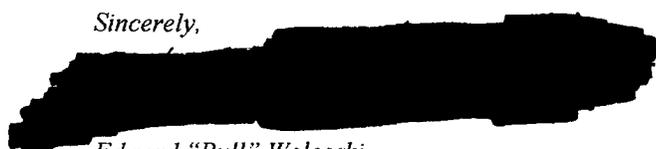
Please keep in mind that the network marketing industry is one of the few remaining opportunities for the average person on the street to earn additional income or to create a new career. In addition, this industry is also growing in popularity and contributes to the US economy. This growth should be encouraged.

I have been involved network marketing off and on for 35 years. I have met some of the finest people and have been introduced to some of the best products. This home based business has helped me significantly due to my physical limitations and declining health.

I completely understand the importance of the FTC mission "to stand up for America's free market process and for its consumers, who benefit from competitive markets in which truthful information flows." However, I believe this proposed new rule exceeds what is necessary and needs significant modification. We live in a free market economy where people have the responsibility of making informed decisions based on best information. A better approach would be to provide consumers with objective criteria when analyzing a business opportunity and let an informed market proceed. I am in support of the proposed disclosures that should be made during the sales process, without the requirement of a seven-day waiting period, only if modified as suggested.

Thank you for attention to my concerns to this very important issue.

Sincerely,



Edward "Bull" Wolcoski