

522418-70436



May 21, 2006

Dear Sir/Madam,

I am writing in response to the proposed New Business Opportunity Rule, R511993. If this rule is not modified, it will have 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.

I strongly oppose the 7-day waiting period. Since the proposed rule would require a seven day waiting period to enroll new distributors, in essence, we would be selling a person twice on the same business - even if there is no initial signup fee, as it is with one of the companies that we represent.

While I support some of the disclosures with modification, I am strongly opposed to a seven-day waiting period because of its excessive burden to any company and distributor who would be required to document and follow-up on the process; impeding any and all new business development.

In regards to the earnings disclosure, I support the disclosure of an average earnings income statement because it is a good business practice to establish realistic expectations; however I oppose being forced to provide written substantiation because of the excessive burden placed on the business environment.

When considering the amount of money required to begin a new business in the network marketing industry, the start up capital is substantially less when compared to a brick-n-mortar type of business.

In regards to previous litigation, I would only support the disclosure of any 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 or if the opposing parties agreed to settle without admission of guilt, then it should not be necessary to disclose this information.

Also, if the parties agreed to settle without admission of guilt, there is usually some public document available, particularly if it involves a government agency; therefore further disclosure would not be necessary.

Lastly in the rule regarding references: While it is a good practice to provide references of satisfied customers, I contend that releasing this information is in a violation of personal confidentiality.

Requiring the release of this information could greatly threaten the business-to-customer relationship as well as the business-to-business relationship.





Additionally, it subjects these references to cross-marketing by competitors.

I am recommending that contact information for purchasers be made available upon request, that their availability be published on company materials, and do to Internet marketing, that they not be limited to geographic proximity.

The network marketing industry is one of the few remaining opportunities for people to leverage their time and limited resources to earn additional income or to create a new career.

Many companies are publicly traded on Wall Street. Some major corporations like Citigroup, MCI and IBM utilize the network marketing industry to market their products and services.

The industry is growing in popularity and contributes to, not only the US economy, but also worldwide. This growth should be encouraged.

According to the Direct Selling Association, there are over 13 million Americans marketing products and services via the network marketing industry.

Retail sales of products and services through network marketing were estimated to be over \$29.7 Billion as of 2004, according to the Direct Selling Association.

My educational background is in the field of Mechanical Engineering. After being downsized 5 times, I sought another means of providing income for myself and my family.

I have been involved in the network marketing industry for the more than 9 years.

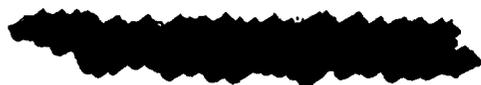
I have met some very fine people in this industry; people that I would have not have, otherwise, met. Many of those people are now my personal friends.

The products and services that we have been introduced to, have met with our expectations for excellent quality.

This home based business has helped to provide additional revenue, supplementing my income, thereby providing me the opportunity to provide for myself and my family.

I understand and value the role of the FTC's 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 that 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 the best information.





A better approach would be to provide consumers with objective criteria when analyzing a business opportunity and then let an informed market proceed.

I am in support of the 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, in advance, for reviewing and posting my comments.

Sincerely,

[Redacted signature]

Cheryl A Wistos, CEO

[Redacted text]

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