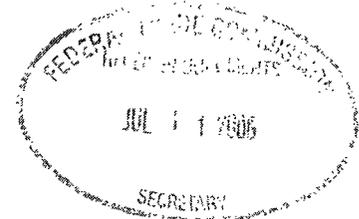


Mr. LeRoy C. Manners

UNITED STATES  
4 July 2006



522418-70441

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 Person:

Regarding the proposed Rule R511993 above stated subject, I find it to be unhelpful to the direct selling industry in which I devote time and effort to create my business so as to earn a livelihood. My prospective clients are treated with respect in my presentation of the nature of the business that they can embrace while I'm selling the inherent product(s).

This type of selling is quite different from the market/store layout of their products. Direct selling (marketing) must generate persons who will spend time concentrating on the product(s) as it is presented initially; if they are distracted from the product and its business opportunity by any number of disclosures (and their related forms), their interest wanes and can become lost due to that distraction.

Another negative distraction can be engendered by a waiting period, as in the automobile and real estate industries with their "three-day waiting period" rule; a proposed seven-day waiting period will only serve to drive away valid interest. Any such interest will be lost by the requirements for earnings (which are cyclical in nature) substantiated disclosure and prior legal action disclosure involving the product's company and/or the business opportunity presenter, even if found not guilty; and disclosure of the names of some number of business purchasers wherein this type of disclosure data can and most assuredly will be used by competitors ("data brokers") all these will raise the skepticism level.

I counter propose that the "free-market" system be promoted and allowed to operate by your Federal Trade Commission in each of the areas I've addressed above. Submission of the multitudinous disclosure forms proposed in Rule 511993 will be an excuse to enlarge the federal-state-county-city public employment rolls and will necessitate strict responsibility to prevent loss of confidential data, as just occurred in the Veterans Administration in Washington, DC. Most multi-level marketing entities are honest, fully policing their independent distributors and leaders. Let's keep it this way by not imposing the heavy burdens of Rule R511993. There is still the responsibility of the customers to search out the objective criteria to make a business decision.

Sincerely,

  
LEROY C. MANNERS