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522418-70513



June 12, 2006

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Ave, NW
Washington DC 20580

Re: Business Opportunity Rule, R511993

Dear Sir or Madam:

This proposed rule would be a disaster for my direct sales businesses. I have a licence to practice medicine and chiropractic, but I am self-employed, full-time, as a Mannatech Associate educating family, friends, and colleagues about the terrific benefits of glyconutrient supplementation.

I practiced medicine for twenty one years, first as an internist and the last five years as an anesthesiologist before having to retire in 1989 because of a neck injury. After a few years of deteriorating health in retirement I discovered chiropractic care which I had eschewed all of my life as quackery. So at age fifty nine I entered chiropractic school and graduated last year at age sixty three – much healthier than I was a few years earlier. During the time I was in chiropractic school I was introduced to glyconutrient supplementation by another medical doctor. I have taken them for two years now and the benefits to my health have been beyond my wildest expectations. That and the growing scientific basis for glyconutrient supplementation has convinced me that this technology will be a MAJOR advance in improved nutrition for the future.

MIT's *Technology Review*, February 2003, listed the study of glycobiology as one of "ten emerging technologies that will change the world."

Acta Anatomica in 1998 devoted an entire issue to glycobiology. In an editorial they stated:

The last decade has witnessed the rapid emergence of the concept of the sugar code of biological information. Indeed, monosaccharides represent an alphabet of biological information similar to amino acids and nucleic acids, but with unsurpassed coding capacity.

Because this technology is so new, it requires person-to-person education to conduct the business. People are skeptical because most of mainstream medicine and the general media are blissfully unaware of this new knowledge which is primarily in basic-science research journals. It usually takes me weeks to months of contact by phone and in person before I am able to sign up a potential associate. It is ridiculous for me to keep detailed accounts of every contact that I make with potential prospects since much of the time I am in a social or professional setting. You are proposing to turn a pleasant, person-to-person business into a paper-work nightmare. I do this as a full-time, home-based business; I do not have and cannot afford a secretary. There's no extra time to keep accounts of every contact and at what point the seven-day waiting period begins without reducing my productivity. This is, in effect, a new and unnecessary tax on my ability to produce income.

Network marketing is the most efficient way to deliver products to the consumer. The entry costs for the individual associate is probably the lowest of any type of business structure. People who want to do this part-time and keep their old jobs while they gradually transition into a home-based business will find the time-costs that your rules will impose prohibitive. Your seven-day waiting period implies that there is something shady about the business model and the company - Mannatech - that I am proud to be associated with.

Mannatech has revolutionary, research-based products that will change the wellness industry in the coming years. As a reputable company they have full-return policies on all of their products. I have never had a complaint or heard of a complaint about buyer's remorse. Many persons just want to take the products for their own consumption, but join as associates because this is the cheapest way to get them at wholesale price. There is no obligation to buy more, no pressure to buy more, and NO obligation to engage in the business aspects of being an associate. However, after taking the products for awhile and experiencing the benefits some tell their friends and family about Mannatech. I can't predict in advance who will take advantage of the business opportunity. Your rules would scare off many first-time customers who join as associates for the cheapest prices.

Last March I attended a family affair celebrating the 99th birthday of my Aunt Sara Kate in Greenwood, SC. There were at least fifty cousins and aunts and uncles at the reunion and during the course of the day I spoke to every branch of my family tree about the benefits of Mannatech products. Am I supposed to keep a detailed business account of every conversation I had with family members? This is my business: every person I meet or talk to is a potential customer because I believe in the products so strongly. You are proposing Big Brother on steroids.

The proposed rule on disclosing litigation is absurd. The very first person that I signed up had a friend who helped her go on the internet and found some derogatory comments about the company. I went on the internet and followed these leads and satisfied myself and the prospect that they were without merit. I have since confirmed this conclusion many times over while being associated with the company for over two years. I solved the problem for myself and the prospect without your rule. All of this information is easily found on the internet. I see no reason to be forced to mention every crack-pot litigant who brings a meritless law suit. Does freedom not

have any responsibility? If we make security top priority, as you apparently want to do, we will eventually have neither freedom or security.

I would have thought the above rules would have been so absurd on their face that no sensible person would propose them. However, when I saw the last one, I was even more stunned. While we are pommelled daily with threats of IDENTITY THEFT, the FTC proposes that we MUST disclose a minimum of ten prior purchasers NEAREST the prospective purchaser. Is the shy, older lady, living alone, who signed up to receive the products at wholesale price for her personal use only - but automatically free to tell others about the products if she wishes - going to be pleased when she receives a call from a perfect stranger in her neighborhood. Would you be surprised that she might be paranoid, with good reason, that someone may be stalking her? Are you going to be there to actually, really, protect her and reassure her that this is a reputable person who received her personal information because of your rule. Or am I responsible for the reputation of the person receiving the personal information? What means do I have to be sure this is an upright person that I am handing over personal information to about other people. This rule will kill my business; in fact, I probably will not be able to continue in good conscience if I have to follow this rule.

Every aspect of this rule will not only increase burdensome paperwork but will decrease my ability to conduct a business that I so strongly believe in and by which I support myself. Why not let state and federal prosecutors go after fraudulent businesses and individuals rather than impose this rule on respectable and honest entrepreneurs like myself?

Sincerely,


Robert H. Burns III, M.D., D.C.