

Dr. Larry Payne
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June 9, 2006

Re: Business Opportunity Rule R511993

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

To Whom it May Concern:

The purpose of this letter is to express my concern over the proposed Business Opportunity Rule (R511993). I believe if it is passed as it is written, it would not be in the best interests of the business community. While I understand and appreciate the role of the FTC to protect the public from unfair business practices, some of the sections will make it unreasonably difficult to market products.

A seven day waiting period before enrolling new members would be difficult to explain to someone who wants to take advantage of an opportunity now. The idea of a waiting period gives the impression that something is wrong with the process or the company. This rule would also prevent people from receiving needed products in a timely fashion. It also would create extra paperwork and an additional plan for follow-up. My company, Mannatech has already made concessions for anyone who is not pleased with a purchase and provides a 90% buyback policy for all products, including sales kits that were purchased in the last 12 months.

I believe under the proposed rule that it would be unfair to require the release of information regarding lawsuits unless a company is found guilty. Innocent until proven guilty. And, finally, the proposed rule that would require disclosing a minimum of 10 previous purchasers to the prospective purchaser is in opposition to the HIPPA laws that are already in place. This ruling alone would make people reluctant to share their information.

I have been in with Mannatech for over four years, and have found no reason to doubt their integrity. They have made every effort to be forthcoming with regard to every associate's needs and protection. I do not believe this proposed new ruling would be in the best interests of our business or the interests of the business community at large. I believe there are other ways to accomplish changes that may need to be implemented.

Sincerely,
[REDACTED]

Dr. Larry Payne