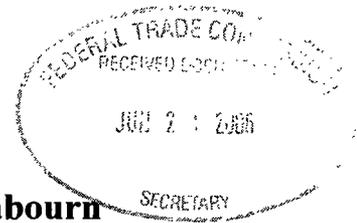


522418-70541

June 15, 2006
Helen Veatrice Rabourn
PAY LIFE FORWARD



Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Mannatech Distributor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Mannatech products.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Distributors. Mannatech's product packs cost from only \$99 to only \$1,099. Typically, a person buys a Mannatech product pack because it offers the best price, not because he or she wishes to sell Mannatech's products. People buy TVs, cars, and other items that cost much more than that and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary, because Mannatech already has a three-day 100% money back cancellation policy for all product packs. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Mannatech and will then have to send in many reports to Mannatech headquarters.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. Otherwise, Mannatech and I are put at an unfair advantage even though Mannatech has done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but, in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. Also, depending on the prospective buyer, giving the names of prior purchasers to them could be a sneaky way for that prospective buyer to insight into my customer list. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Mannatech headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been a Mannatech Distributor since almost 7 years. Originally, I became a distributor for Mannatech because being a distributor assures that I can purchase my personal consumption products the best price whether or not I plan on selling the products. I wanted to take the Mannatech's products because they supplied to me nutrients that are not available in the modern food supply. Eventually, I chose to share the information about the products because I became healthier when taking them. Now, my family depends on this extra income to supplement our budget. My story is similar to most Mannatech Distributors in that the vast majority of distributors starts taking Mannatech products for the health benefits and, only later, decides to share the products with others.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,


Helen Veatrice Rabourn

P.S. You probably received a great deal of letters which vary little from the one above. In a busy world we often use short cuts. I'm sure you're familiar with the form letter and will use many of them in responding to people regarding this issue. That is if we get a response. The prepared letter stated what I wanted to say very well with just a few changes. But, I'd also like to add, that often times a law, rule, etc. (and later the guidelines for implementing a law/rule become much more cumbersome and unfair than anyone would have intended when the law/rule was introduced, drafted and voted on). But, I really want you to think about how this rule limits me and others like me when sharing the Mannatech products with others. From my viewpoint, this rule would effectively limit me and many, many others like me from being able to pursue to any degree entrepreneurial efforts thereby assuring I (and again others like me) would be unable to get ahead without the requirement for large capital investments and/or some super terrific innovative product. Until, I found Mannatech, I truly believed that I wasn't entitled to Dream the American Dream. I believed that I was one of those people who simply had to accept my lot in life. Now, I have a DREAM. I have a reason to keep going, to continue to work towards accomplishing that dream. I certainly have a good personal reason for sharing the benefits to be gained from the products as my granddaughter is very possibly alive today because she began getting the nutrients she needed to develop muscles at a critical point in time in her young life (4 months). Even, with this being the case, I'm very cautious in how I approach people as I want all contacts to be genuine. I've had to endure seeing many people who could have really benefited from the products and/or the business opportunity pass it up because it wasn't the right time for them to see what was being shared with them.

I HATE IT WHEN SOME ONE MAKES A LAW OR A RULE AND APPLIES TO BROADLY TO A GROUP OR CLASS OF PEOPLE JUST BECAUSE THEY HAVE A FEW WHO PLAY THE GAME UNFAIRLY OR ILLEGALLY. Bosses do it to keep from being the bad guy who has to correct the behavior of a few. You find it many places in life. BUT, I REALLY HATE IT WHEN LAWMAKERS AND REGULATORY AGENCIES DO IT. They act like we, the people as a whole, don't have enough sense to check out what we're doing before we do it. You can't protect everyone from everything that might not work out perfectly. Too much is taken away from too many in order to protect the few who don't check things out before the buy in. I'm one of those people who hasn't really made a BIG BOOMING BUSINESS out of the Mannatech opportunity. And, the products are certainly the highest in quality with integrity and in my opinion, they lead the

way in setting and maintaining good manufacturing practices in the food supplement industry. It's not that I don't want to grow my business. I do, but I refuse to do it haphazardly. But, my very being won't allow me to let anyone think they are being taken. But, I certainly feel that this proposed rule would make the hurdles and obstacles of continuing to share the benefits of these products and the potential of the business so great that I and many others would be forced to cease trying.

FURTHERMORE, the PEOPLE YOU ARE TRYING TO STOP with this rule WILL FIND ANOTHER WAY. THEY ALWAYS DO. You will only stop the honest people whose level of integrity causes them to proceed with caution in order not to bring harm to others while the motive is only to bring good to them.

Thanks again for your time in truly considering what THE PEOPLE WANT AND NEED FROM YOU ON THIS ISSUE AND OTHERS ISSUES OF A SIMILAR NATURE IN THE FUTURE. Please don't sabotage the little people just because you're trying to STOP a few sleazy guys.