

The Honorable Joseph A. Spetrini
Acting Assistant Secretary for Import Administration
U.S. Department of Commerce
Attn: Central Records Unit, Room 1870
14th and Constitution Avenue NW
Washington, D.C. 20230

July 11, 2005

Dear Assistant Secretary Spetrini:

On behalf of Alticor Inc., one of the world's largest direct sale companies, we wish to express our support of the revocation of Ukraine's non-market economy (NME) status under section 771(18) of the Tariff Act of 1930, as amended ("the Act").

It is our understanding that the Department of Commerce examines six criteria in determining a country's status as a market or non-market economy: currency convertibility, wage determination, openness to joint ventures and foreign investment, government ownership of means of production, government controls over price and resource allocation, and other appropriate factors. We believe that Ukraine has opened their economy and made great strides to address these criteria since 2002, the year of their last NME status review.

2004 was a historic year for the Ukrainian people. The Orange Revolution that brought President Viktor Yushchenko to power was a powerful statement made by the Ukrainian people of their desire for political and economic reform. The United States, the world's champion of democracy and trade liberalization, should take this opportunity to support the efforts made by the people of Ukraine and revoke their NME status. Alticor recently entered the Ukraine market and has been offering Ukrainians the opportunity to start their own small business selling and distributing Amway products. We have found Ukraine to be a growing market that should be encouraged by the United States to continue its reforms and growth. The spirit of free enterprise is alive in Ukraine!

In short, recognizing Ukraine as a market economy will acknowledge the progress the country has made and encourage them to remain on course with their challenging economic reforms. American business in Ukraine will certainly benefit as a result of the Department of Commerce's revocation of their NME status.

Sincerely,

Richard N. Holwill
Vice President for Public Policy
Alticor Inc.