



May 22, 2008

VIA ELECTRONIC SUBMISSION

Mr. Donald S. Clark, Secretary
Federal Trade Commission
Room H-135 (Annex S)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

RE: Business Opportunity Rule, R511993

Dear Secretary Clark:

On behalf of USANA Health Sciences, Inc. ("USANA"), our employees and our more than one hundred thousand independent distributors, I want to thank the Commission for your good faith consideration of the thousands of comments submitted by direct selling companies, such as USANA, and their independent direct sellers concerning the notice of proposed rulemaking regarding business opportunities issued by the Commission in April 2006. USANA agrees with the FTC's conclusion that revisions to the original proposed rule were necessary to exempt legitimate direct sellers from the rule's application.

As a reputable direct selling company and a long-time member of the Direct Selling Association ("DSA"), USANA acknowledges and supports the FTC's consumer protection mission, and we share your commitment to protect the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as our own direct selling industry.

DSA plans to submit to the FTC a few key comments regarding the Proposed Revised Business Opportunity Rule with the intent of resolving certain minor ambiguities in the proposed revised rule, which could lead to inadvertent application of a final rule to direct sellers. We encourage you to consider these comments and suggestions, which we believe are helpful recommendations that will further the FTC's efforts to perfect, clarify and implement the improved revised business opportunity rule.

Thank you for considering our comments.

Sincerely,

David A. Wentz ✓
President