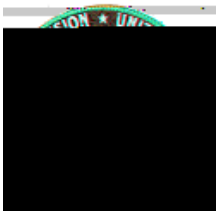

Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

May 8, 2014

Rend Al-Mondhiry, Esq.
Regulatory Counsel
Council for Responsible Nutrition
1828 L Street, NW
Suite 510
Washington, DC 20036-5114

Re: *GeneLink, Inc. and foru™ International Corporation*
FTC File No. 112-3095

Dear Ms. Al-Mondhiry:

Thank you for your comment regarding the above-referenced matter. Your letter was placed on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34, and was given serious consideration by the Commission.

In your comment, you express concern about the scope of the proposed Orders for respondents GeneLink, Inc. ("GeneLink") and foru™ International Corporation ("foru™"). Specifically, you contend that by requiring respondents to substantiate future disease prevention, treatment, and diagnosis claims with two well-controlled human clinical trials (referred to here as "RCTs"), the Commission is creating "a de facto two-RCT standard on health- and disease-related claims" for the food and dietary supplement industry. Letter from Rend Al-Mondhiry, Esq., Regulatory Counsel, Council for Responsible Nutrition, to Commissioners of the Federal Trade Commission (Feb. 3, 2014) ("CRN Comment") at 2. You also state that requiring

It helps the Commission's analysis to hear from a variety of sources in its work, and we thank you again for your letter.

By direction of the Commission.

Donald S. Clark
Secretary