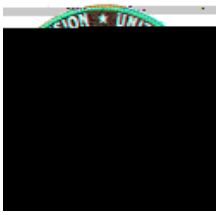

Office of the Secretary

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 and Docket Nos. C-4456 and C-4457

Dear Ms. Al-Mondhiry:

Thank you for your comment, submitted pursuant to 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 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 testing by different researchers and requiring such testing to occur on the product itself or on an essentially equivalent product create undue burdens on respondents. As indicated in the statements of the individual Commissioners, the concerns raised in your comment were among those considered by the Commission when determining the appropriate injunctive relief in this matter.

After carefully considering your comment, the Commission has determined that the public interest is best served