



SHARON A. CHEEVER
Senior Vice President
General Counsel
Law Department

Telephone [REDACTED]
FAX [REDACTED]

email: [REDACTED]

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Mr. Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street N.E.
Washington, D.C. 20549-1090

Re: Comments in Response to Proposed Rule Updated Disclosure Requirements and Summary Prospectus for Variable Annuity and Variable Life Insurance Contracts ("Summary Prospectus"); File Number S7-23-18

Dear Secretary Fields:

Thank you for the opportunity to share our comments on proposed rule Summary Prospectus. Pacific Life Insurance Company ("Pacific Life") respectfully offers the comments below to assist the SEC in implementing their efforts to help investors make informed investment decisions through a simplified, easy to understand prospectus for variable products. We believe these efforts will afford the SEC and industry an opportunity to better serve consumer investment needs and "meet them where they are." With certain changes proposed by Pacific Life and others within the industry to the proposed rule, we feel the SEC can achieve our shared goal of having clear, concise communications that better educate consumers and improve investor understanding of these contracts by making disclosures easier to read and digest.

Support of Proposed Rule Summary Prospectus

Pacific Life is committed to educating consumers in a concise, easy to understand manner and agrees with the SEC that the operation and terminology associated with variable products can be difficult for investors to understand. Pacific Life is pleased to provide its strong general support for the Summary Prospectus rule. In an effort to further the SECs goal of "improve[d] investor understanding" of variable products, and provide a document that explains the product in a way that is "easier to read and more understandable for investors," Pacific Life offers the following comments. We are in full support of the commentaries submitted by other industry groups, thus are limiting our comments to the proposed vernacular required of the Initial and Updating

Summary Prospectus, related documents, and forms, in an effort to focus on the continued endeavor to “future proof” the effected rule.

Comments to Requirement of Language Used

Throughout the proposed rule there are many “terms of art” that are used to describe the features of an annuity that, if codified, would require carriers to describe annuity characteristics in the same manner the industry communicates, yet, such terms may not be understood by the general public. These long-standing industry terms and phrases related to annuities can be confusing and difficult for consumers to understand. For example, “death benefit,” “mortality and expense risk charges,” and “surrender charge” to name a few. While the option to provide summary prospectuses is an important and welcome innovation in the annuity industry’s communications with consumers, we believe that codifying “old”, technical, and not consumer friendly annuity language would defeat the spirit of the proposed rule.

Request for Flexibility in Content

Pacific Life and other industry groups believe that a more flexible approach in how annuity products and features are described would best accomplish the SEC’s goal of “help[ing] investors make informed decisions regarding...” variable products. The SEC has stated a concern as to the “...content of disclosures in the variable contract context may make it difficult for some investors to find and understand key information that they need to make an informed investment decision.” In the interest of consumers, a necessary step in this transparency effort is to give the industry flexibility to move away from the “old” language of annuities to a “new” language that will make it easier for consumers to understand the features and benefits of their chosen retirement solution. This flexibility would include allowing a carrier to simplify complex and inaccessible language and communicate key features of the product by focusing on what resonates with consumers and what they can clearly and easily understand.

We therefore request that the SEC avoid prescribing any specific terminology about annuities, their features, or their benefits to be included in the Initial Summary Prospectus or the Updating Summary Prospectus under the new rule and amendments. In lieu of specific terminology, we request the SEC prescribe the underlying *content* of disclosures to be included in the prospectuses while allowing the flexibility in recognition of industry-wide efforts to better serve consumers by simplifying annuity language. The industry would like the latitude to provide new descriptions and use plain English that sufficiently discloses the content required by the codified rule. As such, these consumer-friendly terms would be included in the Special Terms, Glossary, and/or Key Information Table sections of the prospectuses.

Goal of Uniformity

One aspect of a consumer making an “informed decision” as to their investments is the ability to compare products amongst carriers. If carriers are using varying terminology, how can this be accomplished? If carriers are provided the flexibility requested, industry “terms of art” can be included in parenthesis with the new term and/or be used in the description or definition of such term. For example, “surrender charge” could be added in parenthesis if the carrier described this

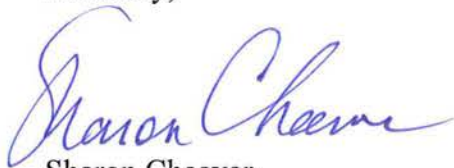
feature as “the cost of terminating your contract early.” By rephrasing “surrender charge,” the consumer can more easily understand that there is a cost to them for terminating their contract too soon, but the industry term can still be included in that explanation for ease of reference and comparison. Pacific Life believes like other industry groups that “meeting the consumer where they are” would further the stated goal of helping investors better understand these products.

Conclusion

Pacific Life appreciates the Commission’s desire to move to an amicable option for delivery of key information of its variable products to consumers. For the reasons stated above, Pacific Life supports a better solution to reach this level of consumer education.

Pacific Life joins the American Council of Life Insurers, the Insured Retirement Institute, and Committee of Annuity Insurers in supporting codification of the Summary Prospectus rule. In order for us to achieve our shared goal for American retirement investors to make better-informed investment decisions, and receive that information in a clear, easy to understand manner, we firmly believe it is in everyone’s best interest to get the Rule and implementation done correctly to maximize consumer education of variable products and avoid future iterations of the rule.

Sincerely,



Sharon Cheever
Senior Vice President and
General Counsel