

April 9, 2004

Jonathan G. Katz
Secretary
United States Securities and Exchange Commission
450 Fifth Street, NW
Washington DC 20549-0609

RE: Request for Comments on Proposed Rule Changes Creating New Disclosure Requirements at Point of Sale and Confirmation and Related Matters – File No. S7-06-04

Dear Mr. Katz:

Enclosed please find a series of comments prepared by John L. Dixon, President of Pacific Select Distributors, Inc. (“PSD”) in response to the above referenced matter. Mr. Dixon is traveling and asked that I submit his comments.

Mr. Dixon’s comments summarize the business of PSD. Mr. Dixon’s comments focus on the concerns of retail broker-dealers as well as those of investors with the proposed rule changes.

We understand that you will be receiving comments from the Investment Company Institute (“ICI”), American Council of Life Insurers (“ACLI”) and National Association for Variable Annuities (“NAVA”). We work closely with each of these organizations’ and have provided comments to them. We ask that you carefully consider their observations.

We sincerely appreciate the opportunity to provide comments.

Sincerely,

S. Kendrick Dunn
Assistant Vice President

Cc: John L. Dixon, President, PSD