



May 6, 2015

DEWEY P. BUSHAW
Executive Vice President
Retirement Solutions Division

Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Comment Period for Conflict of Interest Rule and Related Exemptions

Ladies & Gentlemen:

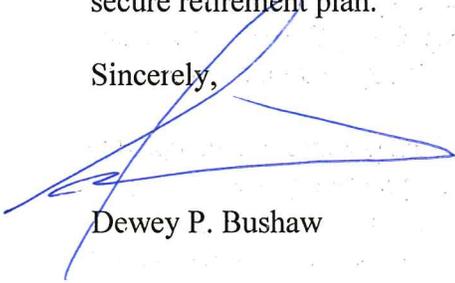
Thank you for the opportunity to comment on the recently released Conflict of Interest Rule proposal and Related Exemptions. Pacific Life Insurance Company would like to request a 45-day extension of the comment period for the U.S. Department of Labor's proposals regarding the 1) Definition of the Term "Fiduciary"; Conflict of Interest Rule – Retirement Investment Advice, 2) Best Interest Contract Exemption, 3) Principal Transaction Exemption, and 4) related amendments to four existing prohibited transaction exemptions.

The Department has clearly dedicated a substantial amount of time and resources to develop a comprehensive regulatory framework to address the feedback received after the 2010 proposal. Pacific Life Insurance Company would like the opportunity to similarly undertake a thoughtful and comprehensive analysis of the proposal. The proposal creates new and significant definitions and steps to compliance for exemptions. Pacific Life requests that adequate time be given to consider the practical realities that will arise in the variety of fact patterns that may be swept into the proposal's requirements.

Pacific Life appreciates the reasonable approach that the Department of Labor has taken in the past in understanding the groundbreaking nature of the proposed changes to long established regulations. Insofar as the current proposal is even more comprehensive and far-reaching than previous proposals, we respectfully ask for a more meaningful time period within which to develop appropriate comments.

A comment period of 120 days is necessary to provide thorough comments to the Department on the proposal that will ensure that the regulations help individuals meet their goals of a safe and secure retirement plan.

Sincerely,



Dewey P. Bushaw

PACIFIC LIFE INSURANCE COMPANY

700 Newport Center Drive, Newport Beach, California 92660-6397 Tel (949) 219-5374, (800) 722-2333 Ext 5374, Fax (949) 219-6553

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