April 3, 2008

Steven Nichols, President and CEO K Swiss Inc. 31248 Oak Crest Drive Westlake, CA 91361

Re: K Swiss Inc.

Form 10-K for Fiscal Year Ended

December 31, 2006 Filed February 8, 2007 File No. 000-18490

Dear Mr. Nichols:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

If you have any questions, please call Edwin S. Kim at (202) 551-3297.

Sincerely,

John Reynolds Assistant Director