

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

July 13, 2010

Steven Nichols, CEO K•Swiss Inc. 31248 Oak Crest Drive, Westlake Village, CA 91361

> Re: K•Swiss Inc. Form 10-K for Fiscal Year Ended December 31, 2009 Filed February 18, 2010 File No. 000-18490

Dear Mr. Nichols:

We have reviewed your filing and related documents and have no further comments at this time.

Sincerely,

John Reynolds Assistant Director

cc: George Powlick, CFO Fax: (818) 706-5397