



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3561

January 26, 2017

Michael J. Happe  
Chief Executive Officer  
Winnebago Industries, Inc.  
P.O. Box 152  
Forest City, IA 50436

**Re: Winnebago Industries, Inc.  
Registration Statement on Form S-3  
Filed January 20, 2017  
File No. 333-215641**

Dear Mr. Happe:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Julie Griffith at 202-551-3267 with any questions.

Sincerely,

/s/ Justin Dobbie

Justin Dobbie  
Legal Branch Chief  
Office of Transportation and Leisure