



DIVISION OF  
CORPORATION FINANCE

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

March 7, 2013

Via E-mail

Thomas A. Haubenstricker  
Chief Financial Officer  
Zale Corporation  
901 W. Walnut Hill Lane  
Irving, Texas 75038-1003

**Re: Zale Corporation**  
**Form 10-K for the Fiscal Year Ended July 31, 2012**  
**Filed October 3, 2012**  
**File No. 001-04129**

Dear Mr. Haubenstricker:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Dietrich A. King for

Mara L. Ransom  
Assistant Director