

Mail Stop 3561

November 1, 2006

Mr. Dennis Highby  
President and Chief Executive Officer  
Cabela's Incorporated  
One Cabela Drive  
Sidney, NB 69160

**Re: Cabela's Incorporated**  
**Form 10-K for the Fiscal Year Ended December 31, 2005**  
**Filed March 1, 2006**  
**File No. 1-32227**

Dear Mr. Highby:

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

Sincerely,

William Choi  
Accounting Branch Chief