

Mail Stop 3561

January 28, 2010

VIA FACSIMILE AND U.S. MAIL

Thomas L. Millner  
President and Chief Executive Officer  
Cabela's Incorporated  
One Cabela Drive  
Sidney, Nebraska 69160

**Re: Cabela's Incorporated**  
**Form 10-K for Fiscal Year Ended December 27, 2008**  
**Filed February 26, 2009**  
**Definitive Proxy Statement on Schedule 14A**  
**Filed March 31, 2009**  
**Form 10-Q for Fiscal Period Ended March 28, 2009**  
**Filed May 1, 2009**  
**File No. 1-32227**

Dear Mr. Millner:

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

Sincerely,

H. Christopher Owings  
Assistant Director