



DIVISION OF
CORPORATION FINANCE

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

April 26, 2011

Via Email
Ralph Castner
Chief Financial Officer
Cabela's Incorporated
One Cabela Drive
Sidney, Nebraska 69160

Re: Cabela's Incorporated
Definitive Proxy Statement on Schedule 14A
Filed April 26, 2011
File No. 001-32227

Dear Mr. Castner:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

/s/ Christopher F. Chase for

H. Christopher Owings
Assistant Director

cc: Brent LaSure
General Counsel
(Via Email)