



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)