



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

DIVISION OF
CORPORATION FINANCE

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)