

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

June 15, 2020

Robert P. Verostek Senior Vice President and Chief Financial Officer Denny's Corporation 203 East Main Street Spartanburg, South Carolina 29319-0001

> Re: Denny's Corporation Registration Statement on Form S-3 Filed June 8, 2020 File No. 333-239004

Dear Mr. Verostek:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Cara Wirth at (202) 551-7127 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Justin W. Chairman, Esq.