



DIVISION OF  
CORPORATION FINANCE

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

June 28, 2010

Via Mail and Fax

Stephen C. Vaughan  
Executive Vice President and Chief Financial Officer  
Sonic Corp.  
300 Johnny Bench Drive  
Oklahoma City, OK 73104

**RE: Sonic Corp.**  
**File Number: 000-18859**  
**Form 10-K for the Year Ended August 31, 2009**

Dear Mr. Vaughan:

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

Sincerely,

Lyn Shenk  
Branch Chief