

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

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

April 1, 2016

Claudia S. San Pedro Chief Financial Officer Sonic Corp. 300 Johnny Bench Drive Oklahoma City, Oklahoma 73104

Re: Sonic Corp

Form 10-K for Fiscal Year Ended August 31, 2015

Filed October 23, 2015 File No. 000-18859

Dear Ms. San Pedro:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Lyn Shenk

Lyn Shenk Branch Chief Office of Transportation and Leisure