

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

January 8, 2020

Thomas B. Heacock Chief Financial Officer The Buckle, Inc. 2407 West 24th Street Kearney, Nebraska 68845

Re: The Buckle, Inc.

Form 10-Q for the Fiscal Quarter Ended November 2, 2019

Filed December 12, 2019

File No. 001-12951

Dear Mr. Heacock:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Trade & Services