



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

Mail Stop 3561

January 7, 2010

J. David Flanery  
Senior Vice President, Chief Financial Officer and Treasurer  
Papa John's International, Inc.  
2002 Papa Johns Boulevard  
Louisville, KY 40299-2367

**Re: Papa John's International, Inc.**  
**Form 10-K for the fiscal year ended December 28, 2008**  
**Filed February 24, 2009**  
**Definitive Proxy Statement on Schedule 14A**  
**Filed March 26, 2009**  
**File No. 000-21660**

Dear Mr. Flanery:

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

Sincerely,

Michelle V. Lacko  
Attorney Advisor