



DIVISION OF  
CORPORATION FINANCE

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

September 10, 2019

Steve M. Ritchie  
President and Chief Executive Officer  
Papa John's International, Inc.  
2002 Papa John's Boulevard  
Louisville, KY 40299

**Re: Papa John's International, Inc.**  
**Form 10-K for the Fiscal Year Ended December 30, 2018**  
**Filed March 8, 2019**  
**File No. 000-21660**

Dear Mr. Ritchie:

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 Transportation and Leisure