

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

Mail Stop 3561

September 14, 2009

## Via Facsimile and U.S. Mail

Mr. Jose I. Ortega Chief Financial Officer BENIHANA INC. 8685 Northwest 53<sup>rd</sup> Terrace Miami, Florida 33166

Re: Benihana Inc.

Form 10-K for the year ended March 29, 2009

File No. 0-26396

Dear Mr. Ortega:

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

Sincerely,

David R. Humphrey Branch Chief