

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

DIVISION OF CORPORATION FINANCE

April 28, 2021

Rene Casares Senior Vice President, General Counsel and Secretary Academy Sports & Outdoors, Inc. 1800 North Mason Road Katy, TX 77449

> Re: Academy Sports & Outdoors, Inc. Draft Registration Statement on Form S-1 Submitted April 23, 2021 CIK No. 0001817358

Dear Mr. Casares:

This is to advise you that we do not intend to review your registration statement.

We request that you publicly file your registration statement no later than 48 hours prior to the requested effective date and time. Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Nicholas Lamparski at 202-551-4695 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Joseph H. Kaufman