



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3561

March 30, 2018

Joe Anto
Chief Financial Officer
Fred's, Inc.
4300 New Getwell Road
Memphis, TN 38118

Re: Fred's, Inc.
Form 10-K for the Fiscal Year Ended January 28, 2017
Filed April 13, 2017
File No. 1-14565

Dear Mr. Anto:

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,

/s/ William H. Thompson

William H. Thompson
Accounting Branch Chief
Office of Consumer Products

cc: Lilia Lauren, Senior Vice President Finance
Logan Hale, Controller