February 14, 2008

Mail Stop 3561

Jeffrey W. Kip Senior Vice President and Chief Financial Officer Panera Bread Company 6710 Clayton Road Richmond Heights, MO 63117

RE: Panera Bread Company File No. 000-19253 Form 10-K: For the Fiscal Year Ended December 26, 2006

Dear Mr. Kip:

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

Sincerely,

Michael Fay Branch Chief