

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

DIVISION OF CORPORATION FINANCE

November 2, 2010

David P. Phillips Chief Financial Officer Publix Super Markets, Inc. 3300 Publix Corporate Parkway Lakeland, Florida 33811

> Re: Publix Super Markets, Inc. Annual Report on Form 10-K for the Fiscal Year Ended December 26, 2009 Filed February 26, 2010 Definitive Proxy Statement on Schedule 14A Filed March 11, 2010 File No. 000-00981

Dear Mr. Phillips:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

H. Christopher Owings Assistant Director