



DIVISION OF  
CORPORATION FINANCE

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

May 1, 2020

Steven Coke  
Interim Principal Financial and Accounting Officer  
Papa John's International, Inc.  
2002 Papa John's Blvd  
Louisville, KY 40299-2367

**Re: Papa John's International, Inc.**  
**Form 10-K for the Fiscal Year Ended December 29, 2019**  
**File No. 000-21660**

Dear Mr. Coke:

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,

Division of Corporation Finance  
Office of Trade & Services