**BRYAN D. McCRORY** Direct Dial: 972/770-8854

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February 14, 2007

## VIA FEDERAL EXPRESS

Mr. David R. Humphrey Branch Chief, Division of Corporate Finance Securities and Exchange Commission 450 Fifth Street, N.W. Washington, D.C. 20549

> Re: Brinker International, Inc. (the "Company") Form 10-K for Year Ended June 28, 2006, filed August 23, 2006 — File No. 001-10275

## Dear Mr. Humphrey:

We have received your letter dated February 12, 2007 setting forth certain comments to various items and selected financial data within the abovereferenced filing. In light of your request, as discussed with Lyn Shenk on your staff, we have respectfully requested additional time to prepare a detailed response to your comments. Mr. Shenk agreed that the time frame for our response is extended through Friday, March 9, 2007. We anticipate being able to deliver our response to you on or before that date. We thank you for the courtesy of the extension.

If you have any questions regarding our planned response to your letter, please contact the undersigned at your earliest convenience.

Very truly yours,

/s/ Bryan D. McCrory Bryan D. McCrory Vice President and Assistant General Counsel

BDM/cld

cc: Lyn Shenk Juan Migone Chuck Sonsteby Roger Thomson David Doyle Angie Roberts