December 14, 2020

William Harvey Chief Financial Officer Kirby Corporation 55 Waugh Drive, Suite 1000 Houston, TX 77007

Re: Kirby Corporation Form 10-K for the

Year Ended December 31, 2019

rear Endea December 01, 201

2020

Filed February 24,

File No. 001-07615

Dear Mr. Harvey:

 $\,$ 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 Energy & Transportation