

January 12, 2021

Sheila Anderson
Chief Financial Officer
DAKTRONICS INC /SD/
201 Daktronics Drive
Brookings, SD 57006

Re: DAKTRONICS INC /SD/
Form 10-K for

Fiscal Year Ended May 2, 2020

Filed June 12, 2020
Form 10-Q for

Quarterly Period Ended October 31, 2020

Filed December 3,

2020

File No. 1-38747

Dear Ms. Anderson:

We have limited our review of your filing to the financial statements and related disclosures and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

Form 10-Q for the Period Ended October 31, 2020

Notes to the Condensed Consolidated Financial Statements
Note 1. Basis of Presentation
Other Business Developments - Coronavirus Pandemic, page 8

1. We note your disclosure that you offered voluntary retirement and voluntary exit incentive programs as well as two reductions in force during the six months ended October 31, 2020. Please tell us if these benefits were accounted for pursuant to ASC 420 or alternative accounting guidance, such as ASC 712. For those pursuant to ASC 420, if applicable, tell us your consideration for providing the disclosures required in ASC 420-10-50.

Sheila Anderson
FirstName LastNameSheila
DAKTRONICS INC /SD/ Anderson
Company
January 12, NameDAKTRONICS
2021 INC /SD/
January
Page 2 12, 2021 Page 2
FirstName LastName
Note 5. Segment Reporting, page 13

2. We note your disclosure that you evaluate segment performance based on operating results through contribution margin, which is comprised of gross profit less selling expense. We also note that you present tables for both gross profit and contribution margin; therefore, it appears you have presented two measures of segment profitability. If the chief operating decision maker uses more than one measure of a segment's profit or loss and more than one measure of a segment's assets, the reported

measures shall be those that management believes are determined in accordance with the measurement principles most consistent with those used in measuring the corresponding amounts in the consolidated financial statements. In this regard, please tell us your reportable segments measure of profit or loss and provide an appropriate reconciliation consistent with ASC 280-10-50-30(b).

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations

Results of Operations

Comparison of the Three and Six Months Ended October 31, 2020 and November 2, 2019, page

23

3. We note your tables disclosing dollar amounts of Orders as well as your disclosure of product order backlog and your overview of backlog on page 19. We also note similar disclosures in your earnings releases. Please clarify how these metrics relate to each other

and revise your disclosures to comply with the guidance in SEC Release No. 33-10751

including providing the following for each metric:

a clear definition of the metric and how it is calculated;

a statement indicating the reasons why the metric provides useful information to

investors, and;

a statement indicating how management uses the metric in managing or monitoring

the performance of the business.

4. We note that in the tables on page 26 you present subtotals for contribution margin. The

presentation of the subtotal in any context other than the ASC 280

required reconciliation

in the footnotes to the financial statements represents the

presentation of a non-GAAP

measure. Please revise your reconciliation or identify Contribution Margin as a non-

GAAP measure and provide the disclosures required by Item 10(e) of

Regulation S-K.

Refer to Question 104.04 of the Non-GAAP Compliance and Disclosure Interpretations.

In closing, 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.

You may contact Charles Eastman, Staff Accountant at (202) 551-3794 or Melissa

Gilmore, Staff Accountant, at (202) 551-3777 with any questions.

Sheila Anderson
DAKTRONICS INC /SD/

January 12, 2021

Page 3

FirstName LastNameSheila Anderson
Comapany NameDAKTRONICS INC /SD/

Sincerely,

Division of Corporation Finance
Office of Manufacturing

January 12, 2021 Page 3

FirstName LastName