



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3720

July 14, 2016

David J. Oddo  
Senior Vice President, Finance and Principal Financial Officer  
National CineMedia, Inc.  
9110 East Nichols Avenue, Suite 200  
Centennial, CO 80112-3405

**Re: National CineMedia, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2015  
Filed February 26, 2016**

**Form 8-K  
Filed February 25, 2016  
File No. 001-33296**

Dear Mr. Oddo:

We have limited our review of your filing to the financial statements and related disclosures and have the following comment. Please comply with the following comment in future filings. Confirm in writing that you will do so and explain to us how you intend to comply.

Please respond to the comment 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 comment applies to your facts and circumstances, please tell us why in your response.

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

Form 8-K filed on February 25, 2016

Exhibit 99.1

National CineMedia, Inc. Reports Results for Fiscal Fourth Quarter & Full Year 2015

1. Your presentation of Annual Adjusted OIBDA in the headline of your earnings release is inconsistent with Question 102.10 of the updated Compliance and Disclosure

David J. Oddo  
National CineMedia, Inc.  
July 14, 2016  
Page 2

Interpretations issued May 17, 2016. Please review this guidance in its entirety when preparing your next earnings release.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable Exchange Act rules require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In responding to our comments, please provide a written statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

You may contact Dean Suehiro, Senior Staff Accountant, at 202-551-3384 or Robert S. Littlepage, Accountant Branch Chief, at 202-551-336 or me at (202) 551-3810 with any questions.

Sincerely,

/s/ Robert S. Littlepage, for

Carlos Pachó  
Senior Assistant Chief Accountant  
AD Office 11 – Telecommunications