

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

DIVISION OF CORPORATION FINANCE

December 8, 2020

Sean Goodman Chief Financial Officer AMC Entertainment Holdings, Inc. One AMC Way 11500 Ash Street Leawood, Kansas 66211

> Re: AMC Entertainment Holdings, Inc. Registration Statement on Form S-3 Filed December 3, 2020 File No. 333-251093

Dear Mr. Goodman:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Taylor Beech at 202-551-4515 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services