



DIVISION OF
CORPORATION FINANCE

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

February 14, 2014

Via E-mail

Mr. Abadul Parmach
Chief Financial Officer
Adaptive Medias, Inc.
23 Mauchly, Suite 106
Irvine, California 92618

Re: Adaptive Medias, Inc.
Form 10-K for the Year Ended December 31, 2012
Filed April 10, 2013
Form 10-Q for Fiscal Quarter Ended September 30, 2013
Filed November 19, 2013
File No. 0-54074

Dear Mr. Parmach:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Terry French for

Larry Spirgel
Assistant Director