



DIVISION OF  
CORPORATION FINANCE

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

August 5, 2020

Craig D. Fischer  
Chief Financial Officer  
Hemisphere Media Group, Inc.  
4000 Ponce de Leon Boulevard  
Suite 650  
Coral Gables, FL 33146

**Re: Hemisphere Media Group, Inc.**  
**Form 10-K for the Year Ended December 31, 2019**  
**Filed March 9, 2020**  
**File No. 001-35886**

Dear Mr. Fischer:

We have limited our review of your filing to the financial statements and related disclosures and have the following comment.

Please respond to this 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 this comment, we may have additional comments.

Form 10-K for the Year Ended December 31, 2019

Notes to Consolidated Financial Statements

Note 7. Equity Investments, page F-26

1. Considering that you hold variable interests in certain VIEs but are not their respective primary beneficiary, please disclose the methodology for your determination, including significant judgments and assumptions, as well as other required information pursuant to ASC 810-10-50-5A and advise us in detail.

Craig D. Fischer  
Hemisphere Media Group, Inc.  
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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 Kathryn Jacobson, Senior Staff Accountant at (2002) 551-3365 or Robert Littlepage, Accountant Branch Chief at (202) 551-3361 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology