



DIVISION OF  
CORPORATION FINANCE

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

September 18, 2019

Mark A. Wallace  
Executive Vice President – Chief Financial Officer and Treasurer  
Uniti Group Inc.  
10802 Executive Center Drive  
Benton Building Suite 300  
Little Rock, Arkansas 72211

**Re: Uniti Group Inc.**  
**Form 10-K for the year ended December 31, 2018**  
**Filed March 18, 2019**  
**File No. 001-36708**

Dear Mr. Wallace:

We have reviewed your filing and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

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-Q for the quarterly period ended June 30, 2019

Item 1 Financial Statements

Note 2. Basis of Presentation and Summary of Significant Accounting Policies

Straight-Line Revenue Receivable, page 13

1. We note your disclosure that you have evaluated the collectability of the straight-line revenue receivable related to Windstream in light of Windstream's pending bankruptcy. We further note that you have accounted for the elimination of this receivable as an adjustment to equity as a result of the adoption of ASC Topic 842. Given the write off was in response to Windstream's pending bankruptcy, which occurred in February 2019, please explain to us how you determined it should be accounted for as an effect of adopting a new accounting principal. In your response, please also tell us what consideration was given to writing off the receivable as of December 31, 2018.

Mark A. Wallace  
Uniti Group Inc.  
September 18, 2019  
Page 2

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 Eric McPhee at 202-551-3693 or Robert Telewicz at 202-551-3438 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate and  
Commodities