



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4561

April 26, 2016

Dennis Durkin  
Chief Financial Officer  
Activision Blizzard, Inc.  
3100 Ocean Park Boulevard  
Santa Monica, CA 90405

**Re: Activision Blizzard, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2015**  
**Filed February 29, 2016**  
**File No. 001-15839**

Dear Mr. Durkin:

We have reviewed your April 15, 2016 response to our comment letter 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. Unless we note otherwise, our references to prior comments are to comments in our April 4, 2016 letter.

Consolidated Financial Statements

Consolidated Statements of Operations, page F-3

1. Your response to prior comment number 3 indicates that you intend to present a single line item, Total Net Revenues, in future filings because you believe that additional breakout is not required by Rule 5-03(b) of Regulation S-X. Please explain your basis for concluding that a separate presentation of product and service revenues is not required pursuant to Rule 5-03(b) of Regulation S-X. As part of your response, please explain for each of the "business models" noted in your response why they would not be considered either a product or service. For example, it is unclear to us how the sale of physical boxed software products would not be considered product revenue.

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You may contact David Edgar, Staff Accountant, at (202) 551-3459 or Christine Dietz, Assistant Chief Accountant, at (202) 551-3408 if you have questions regarding comments on the financial statements and related matters. Please contact me at (202) 551-3499 with any other questions.

Sincerely,

/s/ Kathleen Collins

Kathleen Collins  
Accounting Branch Chief  
Office of Information Technologies  
and Services