

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

May 18, 2012

Via E-mail
Daniel Penn
Secretary and General Counsel
Central European Media Enterprises Ltd.
Mintflower Place, 4th floor
8 Par-La-Ville Rd.
Hamilton, Bermuda HM 08

Re: Central European Media Enterprises Ltd. Revised Preliminary Proxy Statement Filed May 10, 2012

File No. 000-24796

Dear Mr. Penn:

We have completed our review of your filing. 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 filing 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 filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Celeste M. Murphy for

Larry Spirgel Assistant Director

cc: <u>Via E-mail</u>

Robert L. Kohl, Esq.

Katten Muchin Rosenman LLP