



March 2, 2018

Filed as Edgar Correspondence

Mr. Larry Spigel  
Assistant Director  
Division of Corporation Finance  
United States Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-7010

Re: Monitronics International, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2016  
Filed March 13, 2017  
Form 10-Q for the Quarter Ended September 30, 2017  
Filed November 3, 2017  
File No. 333-110025

Dear Mr. Spigel:

This letter is submitted by Monitronics International, Inc. ("we" or the "Company") in response to our February 26, 2018 conversation with Christine Adams, staff of the Division of Corporation Finance of the United States Securities and Exchange Commission (the "Staff"), in which we discussed non-GAAP metrics. The Company acknowledges the Staff's comment with respect to the disclosure of non-GAAP metrics and will modify our future SEC filings to exclude the disclosure of Pre-SAC Adjusted EBITDA. Alternatively, we will present creation costs below Adjusted EBITDA for all periods presented in the MD&A - Results of Operations table.

\* \* \* \*

The Company respectfully believes this letter addresses the Staff's comments discussed on the February 26, 2018 telephone call with Ms. Adams. If you desire further information, please do not hesitate to contact the undersigned by letter or by telephone at 972-277-3623.

Sincerely,

/s/ Fred A. Graffam

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Senior Vice President and Chief Financial Officer

CC: Jeff Gardner  
William Niles  
Renee Wilm