Kenneth Gayron Executive Vice President and Chief Financial Officer Avid Technology, Inc. 75 Network Drive Burlington, MA 01803

Re: Avid Technology, Inc.

Form 10-K for the Fiscal Year Ended December 31, 2017

Filed March 16, 2018

Form 10-Q for the Quarterly Period Ended September 30, 2018

Filed November 8, 2018 File No. 001-36254

Dear Mr. Gayron:

We have limited our review of your filings to the financial statements and related

disclosures and have the following comment. In our comment, we may ask you to provide us  $% \left( 1\right) =\left( 1\right) +\left( 1\right) +\left$ 

with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested  ${\sf reg}$ 

 $\inf$  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 September 30, 2018

Note 9. Revenue, page 14

1. Please tell us and disclose the transaction price allocated to the performance obligations

that are unsatisfied as of September 30, 2018 and explain when you expect to recognize

such amount. Refer to ASC 606-10-50-13. This would appear to include amounts

referred to as Other Backlog as provided in the Form 8-K furnished on November 11,  $\,$ 

2018. If you are applying the practical expedient in 606-10-50-14 please tell us and

disclose. Refer to 606-10-50-15.

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.

Kenneth Gayron

Avid Technology, Inc.

November 29, 2018

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You may contact Frank Knapp, Staff Accountant at (202) 551-3805 or Melissa Kindelan, Staff Accountant at (202) 551-3564 with any questions.

Sincerely,

 ${\tt FirstName\ LastNameKenneth\ Gayron}$ 

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Technologies November 29, 2018 Page 2 FirstName LastName Division of Corporation

Office of Information

and Services