UNITED STATES SECURITIES AND EXCHANGE COMMISSION December 14, 2017

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

Global Eagle Entertainment, Inc. File No. 001-35176 – CF#35741

Global Eagle Entertainment, Inc. submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 10-K filed on November 17, 2017.

Based on representations by Global Eagle Entertainment, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.77 through November 20, 2027

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields Secretary