

Ms. Angela Crane Branch Chief Division of Corporation Finance Securities and Exchange Commission Washington, D.C. 20549 USA

Re: IMAX Corporation (the "Company") Response to SEC Comment Letter dated August 17, 2007 File No. 000-24216

Dear Ms. Crane:

We would like to again express our appreciation for the time and consideration provided by the staff of the Division of Corporation Finance of the U.S. Securities and Exchange Commission (the "Staff") concerning the matters presented in the Company's letter dated September 26, 2007 and the revised Exhibit 1 presented to the Staff on October 24, 2007.

During our discussions on November 2, 2007, the Staff noted certain areas presented in Exhibit 1 where it would require clarification or additional information from the Company in order to further its review. As a result, the Company has provided the following further revised Exhibit 1 (clean and blacklined to show changes) to its October 24, 2007 response. The revised Exhibit 1, which is attached, documents such information and should replace Exhibit 1 of the October 24, 2007 submission.

IMAX CORPORATION 2525 Speakman Drive Mississauga, Ontario Canada L5K 1B1 t 905.403.6500 f 905.403.6450 www.imax.com

November 26, 2007

## \*\*\*\*\*\*\*

Should you require clarification or have any further questions, please contact me at (212) 821-0166. The Company stands ready to assist the Staff in any way possible in connection with the matters addressed in this letter.

Thank you,

/s/ Joseph Sparacio

Joseph Sparacio Chief Financial Officer

cc: Kevin Kuhar, Staff Accountant, Division of Corporation Finance, Securities and Exchange Commission Jodie Hancock, Senior Accountant, Corporate Finance Branch, Ontario Securities Commission PricewaterhouseCoopers LLP Robert Lister, IMAX Corporation Members of Audit Committee, IMAX Corporation

2

## Exhibit 1

## Pages A-1 to A-10

[Omitted pursuant to a request for confidential treatment and submitted separately with the Commission]

A-1