



United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

January 30, 2014

Craig M. Geno, Esquire
Law Offices of Craig M. Geno, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157

Re: In the Matter of Hertz Global Holdings, Inc., Docket No. C-4376

Dear Mr. Geno:

This letter responds to the Petition for Approval for the Sale of Simply Wheelz D/B/A Advantage ("Advantage") filed by Franchise Services of North America ("FSNA") on January 2, 2014 ("Petition"). The Petition requests that the Federal Trade Commission approve, pursuant to the Order in this matter, the sale and assignment of certain Advantage assets to The Catalyst Capital Group Inc. The Petition was placed on public record for comments until January 22, 2014, and four comments were received.

After consideration of the proposed structure as set forth in FSNA's Petition and supplemental documents, as well as other available information, the Commission has determined to approve the proposed sale. In accordance with its approval, the Commission has relied upon the accuracy and completeness of information submitted and representations made in connection