

United States of America FEDERAL TRADE COMMISSION

Office of the Secretary

May 29, 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 of Franchise Services Corporation, Inc. for Prior Approval of the Sale of the Non-Transferred Locations filed by Franchise Services of North America ("FSNA") on April 10, 2014 ("Petition"). The Petition requests that the Federal Trade Commission approve, pursuant to the Order in this matter, the sale and assignment of ten closed Advantage locations to Hertz Global Holdings, Inc. and twelve closed Advantage locations to Avis Budget Group. The Petition was placed on the public record for comments until May 19, 2014. No comments were received.

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

By direction of the Commission, Commissioner Wright and Commissioner McSweeny not participating.

Donald S. Clark Secretary

cc: Karen E. Silverman, Esquire 505 Montgomery Street Suite 2000 San Francisco, CA 94111-6538