



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

July 10, 2013

Fleischmann
State of New York

Re: *In the Matter of Hertz Global Holdings, Inc.*
File No. 1010137, Docket No. C-4376

Thank you for your comments regarding the proposed consent order accepted by the Federal Trade Commission for public comment in the above-captioned matter. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). As we understand your comment, you have concerns about whether the Decision and Order would affect one-way rental car pricing by replacing corporate-owned locations with franchisees. The Commission has carefully reviewed your comments in connection with its decision concerning whether to accord final approval to the proposed consent order.

The investigation examined all of the markets in which the transaction was likely to have a competitive impact, including examining the issues of one-way pricing and competition from franchisees. While the proposed Decision and Order does not dictate whether airport locations divested will be operated as franchisees or corporate-owned stores, we did consider the operational plans of Franchise Services of North America, Inc. ("FSNA") and Macquarie Capital USA Inc. ("Macquarie") when determining whether the Decision and Order would adequately replicate competition in the affected markets. In light of these considerations, among others, the Commission has determined that the public interest would best be served by issuing the Decision and Order as final. A copy of the final Decision and Order is enclosed for your information. Relevant materials also are available from the Commission's website at <http://www.ftc.gov>.

It helps the Commission's analysis to hear from a variety of sources in its work on antitrust and consumer protection issues, and we appreciate your interest in this matter.

By direction of the Commission, Commissioner Wright not participating.

Donald S. Clark
Secretary