

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 the public record for comments until January 22, 2014, and four 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 the proposed sale. 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. Among the representations relied on is the representation that Catalyst agrees that the assets it acquires from FSNA remain, for three years from the date the Order became final (until July 10, 2016), subject to the prior approval requirements of the Order.

By direction of the Commission, Commissioner Wright not participating.

Donald S. Clark Secretary

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