



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

Karl Cole-Frieman
Cole-Frieman & Mallon, LLP
One Sansome Street, Suite 1895
San Francisco, CA 94104

MAR 30 2017

Re: FOIA-2017-00513
Comdata, Inc.; Corporate Lodging
Consultants, Inc.; FleetCor
Technologies, Inc.; FleetCor
Technologies Operating Company,
LLC; FleetCor Fuel Cards, LLC

Dear Mr. Cole-Frieman:

This is in response to your request dated February 13, 2017, under the Freedom of Information Act seeking access to investigative records and consumer complaints from January 1, 2007 to the present concerning the following entities:

- Comdata, Inc.
- Corporate Lodging Consultants, Inc.
- Fleetcor Technologies, Inc.
- Fleetcor Technologies Operating Company, LLC
- Fleetcor Fuel Cards, LLC

In accordance with the FOIA and agency policy, we have searched our records as of February 14, 2017, the date we received your request in our FOIA office.

We have located approximately 1296 responsive complaints that consumers have sent to the Federal Trade Commission (FTC). You should know that the enclosed complaints have not necessarily been verified by the FTC. Therefore, you should make your own judgment about relying on the information provided. I am denying access to consumers' names and addresses and any other identifying information found in the complaints. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

In addition, some responsive records constitute confidential commercial or financial information, which is exempt from disclosure under FOIA Exemption 4, 5 U.S.C. § 552(b)(4). *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this response to your request. Failure to pay this bill promptly will result

in our refusal to provide copies of accessible documents in response to future requests. If not paid within 30 days, this bill will accrue interest penalties as provided by Federal Claims Collection Standards, 31 C.F.R. § 900-904, as amended.

Please make checks payable to U.S. Treasury and send payment to:

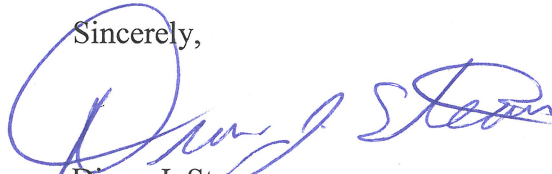
Financial Management Office, H-790
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

You also may seek dispute resolution services from the FTC FOIA Public Liaison Richard Gold via telephone at 202-326-3355 or via e-mail at rgold@ftc.gov; or from the Office of Government Information Services via email at ogis@nara.gov, via fax at 202-741-5769, or via mail at Office of Government Information Services (OGIS), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740.

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Chip Taylor at 202-326-3258.

Sincerely,



Dione J. Stearns
Assistant General Counsel