

Mail Stop 3561

March 4, 2009

Roger S. Penske  
Chief Executive Officer  
Penske Automotive Group, Inc.  
2555 Telegraph Rd.  
Bloomfield Hills, Michigan 48302

**Re:   Penske Automotive Group, Inc.  
      Form 10-K for Fiscal Year Ended December 31, 2007  
      Filed February 26, 2008  
      File No. 001-12297**

Dear Mr. Penske:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

H. Christopher Owings  
Assistant Director