



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

Mail Stop 3561

February 12, 2010

Via Fax & U.S. Mail

Mr. Scott L. Thompson, President and Principal Executive Officer  
Dollar Thrifty Automotive Group, Inc.  
5330 East 31<sup>st</sup> Street  
Tulsa, Oklahoma 74135

**Re: Dollar Thrifty Automotive Group, Inc.**  
**Form 10-K for the year ended December 31, 2008**  
**Filed March 3, 2009**  
**Form 10-Q for the quarter ended March 31, 2009**  
**Filed May 6, 2009**  
**Form 10-Q for the quarter ended September 30, 2009**  
**Filed October 26, 2009**  
**File No. 001-13647**

Dear Mr. Thompson:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Linda Cvrkel  
Branch Chief