



DIVISION OF  
CORPORATION FINANCE

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

January 15, 2021

Ronald F. Clarke  
Chief Executive Officer  
Fleetcor Technologies, Inc.  
3280 Peachtree Road, Suite 2400  
Atlanta, GA 30305

**Re: Fleetcor Technologies, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2019**  
**Filed March 2, 2020**  
**File No. 1-35004**

Dear Mr. Clarke:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services

cc: Joel May