



DIVISION OF
CORPORATION FINANCE

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

February 8, 2012

Via Facsimile

Eric D. Jacobs
Chief Financial and Administrative Officer
DealerTrack Holdings, Inc.
1111 Marcus Ave., Suite M04
Lake Success, NY 11042

Re: DealerTrack Holdings, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2010
Filed February 18, 2011
Form 10-Q for the Fiscal Quarter Ended March 31, 2011
Filed May 10, 2011
Form 8-K Filed May 25, 2011
Form 8-K Filed October 6, 2011
File No. 000-51653

Dear Mr. Jacobs:

We have reviewed your letter dated December 20, 2011 in connection with the above-referenced filings and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter within ten business days by amending your filings, by providing the requested information, or by advising us when you will provide the requested response. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your filings and the information you provide in response to this comment, we may have additional comments. Unless otherwise noted, where prior comments are referred to they refer to our letter dated December 1, 2011.

Eric D. Jacobs
DealerTrack Holdings, Inc.
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Form 10-Q for the Fiscal Quarter Ended March 31, 2011

Item 1. Financial Statements

Note 2. Significant Accounting Policies

Revenue Recognition

Collateral Management Services Transaction Revenue, page 6

1. We note your response to prior comment 6. As part of the disclosures you expect to include in the 2011 Form 10-K, you state that for paper-based and electronic-based title services, amounts allocated to each unit of accounting are based upon estimated selling price. You further state that estimated selling price is based on the selling price for paper-based title services when sold separately. Considering your use of separate sales, you appear to be describing vendor-specific objective evidence of selling price as noted in ASC 605-25-30-6A. Please clarify if this is the case and revise your disclosures accordingly. Alternatively, if you are using the selling price of paper-based transactions when sold separately in addition to other factors, inputs, assumptions and methods in determining estimated selling price, this should be explained in your disclosures. Refer to ASC 605-25-30-6C and 605-25-50-2(e).

You may contact Jennifer Fugario, Staff Accountant, at (202) 551-3482 if you have questions regarding comments on the financial statements and related matters. Please contact me at (202) 551-3406 with any other questions.

Sincerely,

/s/ Patrick Gilmore

Patrick Gilmore
Accounting Branch Chief