

Mail Stop 4561

May 20, 2008

Nathaniel J. Lipman
President and Chief Executive Officer
Affinion Group, Inc.
100 Connecticut Avenue
Norwalk, CT 06850

Re: Affinion Group, Inc.
Form 10-K For the Fiscal Year Ended December 31, 2007
Filed February 29, 2008
File No. 333-133895

Dear Mr. Lipman:

We have completed our review of your Form 10-K and have no further comments at this time on the specific issues raised.

Sincerely,

Stephen G. Krikorian
Accounting Branch Chief