



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4561

January 23, 2017

Todd H. Siegel  
Chief Executive Officer  
Affinion Group, Inc.  
6 High Ridge Park  
Stamford, CT 06905

**Re: Affinion Group, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2015**  
**Filed March 10, 2016**  
**Form 8-K**  
**Furnished on October 27, 2016**  
**File No. 333-133895**

Dear Mr. Siegel:

We have completed our review of your filings. 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,

/s/ Stephen Krikorian

Stephen Krikorian  
Accounting Branch Chief  
Office of Information Technologies  
and Services