January 15, 2021

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

Re: Fleetcor

Fiscal Year Ended December 31, 2019

Technologies, Inc.

Filed March 2, 2020

Form 10-K for

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