



DIVISION OF  
CORPORATION FINANCE

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

April 26, 2016

Mail Stop 4561

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

**Re: Affinion Group Holdings, Inc.  
Registration Statement on Form 10  
File No. 000-55577  
Filed January 29, 2016**

Dear Mr. Siegel:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Matthew Crispino

Matthew Crispino  
Attorney Advisor  
Office of Information  
Technologies and Services

cc: Rosa Testani, Esq.  
Akin Gump Strauss Hauer & Feld LLP