

December 29, 2020

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

Technologies, Inc.  
Fiscal Year Ended December 31, 2019

Re: Fleetcor  
Form 10-K for  
Filed March 2, 2020  
File No. 001-35004

Dear Mr. Clarke:

We have reviewed your filing 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 comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments.

Form 10-K for Fiscal Year Ended December 31, 2019

Part III. Item 11. Executive Compensation (incorporated by reference from Definitive Proxy Statement filed April 28, 2020), page 46

1. We note that you use Adjusted EPS, Relative TSR, and Relative Stock Price Growth as performance metrics for compensation. In future filings, to the extent you continue to use performance metrics that are impacted by your stock repurchases, please discuss if and how the stock repurchases affected the manner in which you set the relevant targets and determined whether such targets were met.

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.

Ronald F. Clarke  
Fleetcor Technologies, Inc.  
December 29, 2020  
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Please contact Cara Wirth at (202) 551-7127 or Lilyanna Peyser at (202) 551-3222 with any other questions.

FirstName LastNameRonald F. Clarke  
Corporation Finance  
Comapany NameFleetcor Technologies, Inc.  
Services  
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cc: Joel May  
FirstName LastName

Sincerely,  
Division of  
Office of Trade &