

DealerAdvance, Inc.
Form AW
March 24, 2008

March 21, 2008

U.S. Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549

Re: DealerAdvance, Inc.
Request for Withdrawal of Post-Effective Amendment to Registration
Statement filed on March 6, 2008 (at 6:12am)
File No. 333-54822

Ladies and Gentleman:

We are counsel to DealerAdvance, Inc. (the "Company"). On behalf of the Company, we hereby request the withdrawal of the above-referenced Post-Effective Amendment pursuant to Rule 477(a) under the Securities Act of 1933, as amended.

The Post-Effective Amendment was inadvertently filed as a post-effective amendment to a registration statement (Pos Am) by Vintage Filings, the Company's edgarizing service. The Post-Effective Amendment should have been filed as a Form S-8 post-effective amendment (S-8 Pos). This was called to our attention in a recent telephone call from the staff. We have refiled the Post-Effective Amendment accordingly.

Please call the undersigned if there are questions or comments. Thank you for your assistance in the matter.

Very Truly Yours,

Guardi & Associates

Noel Guardi, Esq.

/neg

cc: DealerAdvance, Inc.
Derivative Security

(Instr. 3)2. Conversion or Exercise Price of Derivative Security3. Transaction Date (Month/Day/Year)3A. Deemed Execution Date, if any (Month/Day/Year)4. Transaction Code
(Instr. 8)5. Number of Derivative Securities Acquired (A) or Disposed of (D)
(Instr. 3, 4, and 5)6. Date Exercisable and Expiration Date
(Month/Day/Year)7. Title and Amount of Underlying Securities
(Instr. 3 and 4)8. Price of Derivative Security
(Instr. 5)9. Number of Derivative Securities Beneficially Owned Following Reported Transaction(s)
(Instr. 4)10. Ownership Form of Derivative Security: Direct (D) or Indirect (I)
(Instr. 4)11. Nature of Indirect Beneficial Ownership

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(Instr. 4)CodeV(A)(D)Date ExercisableExpiration DateTitleAmount or Number of Shares Employee Stock Option (right to buy) \$ 10
 (1)(2)08/20/2017 Common Stock 98,933 (1) (2) 98,933 D Employee Stock Option (right to buy) \$
 16.67703/17/2014 M 5,137 (2)(3)(4)08/19/2018 Common Stock 5,137 (2) (3) (4) \$ 16.677 49,663 D Employee Stock
 Option (right to buy) \$ 13.46 (2)(5)(6)03/01/2020 Common Stock 111,950 (2) (5) (6) 111,950 D Employee
 Stock Option (right to buy) \$ 14.44 (2)(7)02/25/2021 Common Stock 100,000 (2) (7) 100,000 D

Reporting Owners

Reporting Owner Name / Address	Relationships			
	Director	10% Owner	Officer	Other
Caruso Thomas J. C/O: KAR AUCTION SERVICES, INC. 13085 HAMILTON CROSSING BOULEVARD CARMEL, IN 46032			Chief Client Officer	

Signatures

Rebecca C. Polak as Attorney
 In Fact 03/17/2014
 **Signature of Reporting Person Date

Explanation of Responses:

- * If the form is filed by more than one reporting person, see Instruction 4(b)(v).
- ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations. See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).
- (1) 32,978 of these performance options are currently exercisable. 32,977 of these options vest if the closing price of a share of the Company's common stock exceeds \$30.00 for twenty (20) consecutive trading days and 32,978 of these options vest if the closing price of the Company's common stock exceeds \$35.00 for twenty (20) consecutive trading days.
- (2) An additional condition to vesting is that the reporting person must be a director, officer, employee, consultant or agent of the Company or any of its subsidiaries on the date on which the conditions set forth above are satisfied.
- (3) 13,700 of these options are service options that are currently exercisable.
- (4) 15,413 of these performance options are currently exercisable. 10,275 of these options vest if the closing price of a share of the Company's common stock exceeds \$30.00 for twenty (20) consecutive trading days and 10,275 of these options vest if the closing price of the Company's common stock exceeds \$35.00 for twenty (20) consecutive trading days.
- (5) 11,195 of these options are service options that became exercisable on 3/1/2014.
- (6) 33,585 of these performance options are currently exercisable. 33,585 of these options vest if the closing price of a share of the Company's common stock exceeds \$30.00 for twenty (20) consecutive trading days and 33,585 of these options vest if the closing price of the Company's common stock exceeds \$35.00 for twenty (20) consecutive trading days.
- (7) 50,000 of these service options are currently exercisable. 25,000 of these options become exercisable on 2/25/2014 and 25,000 of these options become exercisable on 2/25/2015.

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure. Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.