

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

Mail Stop 7010

October 19, 2007

Nicolas Berggruen President and Chief Executive Officer Freedom Acquisition Holdings, Inc. 1114 Avenue of the Americas, 41st Floor New York, NY 10036

Re: Freedom Acquisition Holdings, Inc. Proxy Statement on Schedule 14A Filed on October 11, 2007 File No. 1-33217

Dear Mr. Berggruen:

We have completed our review of your Schedule 14A and have no further comments at this time.

Sincerely,

Jennifer Hardy Branch Chief

cc: Brian Gavsie, Esq.
Greenberg Traurig, LLP
401 East Las Olas Boulevard, Suite 2000
Fort Lauderdale, FL 33301