



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

DIVISION OF  
CORPORATION FINANCE

March 15, 2021

Cindy Hageman  
Senior Vice President and Assistant General Counsel  
Alliance Data Systems Corp.  
3075 Loyalty Circle  
Columbus, OH 43219

**Re: Alliance Data Systems Corp.  
Form 10-Q  
Exhibit No. 10.4  
Filed November 4, 2020  
File No. 001-15749**

Dear Ms. Hageman:

We have concluded our assessment of your redacted exhibit for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance