



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 4720

June 29, 2009

By U.S. Mail and facsimile to (224) 405-4695

Mr. Roy A. Guthrie
Executive Vice President and Chief Financial Officer
Discover Financial Services
2500 Lake Cook Road
Riverwoods, Illinois 60015

**Re: Discover Financial Services
Form 10-K for Fiscal Year Ended November 30, 2008
Form 10-Q for the Period Ended February 28, 2009
File No. 001-33378**

Dear Mr. Guthrie:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Michael C. Volley
Staff Accountant