

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

April 21, 2011

David W. Nelms Chief Executive Officer Discover Financial Services 2500 Lake Cook Road Riverwoods, IL 60015

**Re:** Discover Financial Services

Form 10-K

Filed January 26, 2011 File No. 001-33378

Dear Mr. Nelms:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Stephanie Hunsaker Senior Assistant Chief Accountant