

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

January 26, 2017

Mail Stop 4720

Via E-mail
Mr. R. Mark Graf
Executive Vice President and
Chief Financial Officer
Discover Financial Services
2500 Lake Cook Road
Riverwoods, IL 60015

Re: Discover Financial Services

Form 10-K for the Fiscal Year Ended December 31, 2015

Filed February 24, 2016 File No. 001-33378

Dear Mr. Graf:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Stephanie L. Sullivan

Stephanie L. Sullivan Senior Technical and Policy Advisor Office of Financial Services