

April 7, 2010

United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Mail Stop 4561  
Washington, D.C. 20549

Attn: Melissa Walsh, Staff Accountant

Re: Alliance Data Systems Corporation  
Form 10-K for Fiscal Year Ended December 31, 2009  
Form 8-K filed February 2, 2010  
File No. 001-15749

Dear Ms. Walsh:

Alliance Data Systems Corporation, a Delaware corporation (the “**Company**”), is in receipt of the letter dated April 1, 2010 from the Securities and Exchange Commission Staff (the “**Staff**”) relating to the Company’s Form 10-K for Fiscal Year Ended December 31, 2009 and Form 8-K filed February 2, 2010, each filed with the Securities and Exchange Commission (the “**Commission**”) (the “**Comment Letter**”).

Per your instructions to counsel for the Company, this letter will confirm that the Company will submit its response to the Comment Letter after April 15, 2010, but on or before April 30, 2010. The additional time will enable the Company to complete its quarterly close process, complete its earnings release and coordinate the Company’s response with the Company’s audit committee and the Company’s independent accountant.

In its response, and as requested by the Staff in the Comment Letter, the Company will address the Staff’s comments and provide a written statement acknowledging that:

- (1) the Company is responsible for the adequacy and accuracy of the disclosure in the filing;
- (2) Staff comments or changes to disclosure in response to Staff comments do not foreclose the Commission from taking any action with respect to the filing; and

- (3) the Company may not assert Staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

If you have any questions with respect to the foregoing, please call me at (972) 348-5105.

Sincerely,

/s/ Charles L. Horn

Charles L. Horn

Executive Vice President and Chief Financial Officer

Copies: Edward J. Heffernan  
President and Chief Executive Officer  
Alliance Data Systems Corporation  
17655 Waterview Parkway  
Dallas, TX 75252

Alan M. Utay  
Executive Vice President and General Counsel  
Alliance Data Systems Corporation  
17655 Waterview Parkway  
Dallas, TX 75252