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**To:** <secretary@fmc.gov>  
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I am counsel for Discover Financial Services, Inc. and would welcome an opportunity to participate in the June 11 FMC hearing on the proposed regulation. DFSI supports the proposed removal of the current \$15 million ceiling on revenues used to calculate non-performance bonds, and the proposed elimination of the self insurance option for complying with the financial responsibility requirements. DFSI strongly opposes, however, the exclusion from the financial responsibility bond calculation of revenues from ticket purchases made with credit cards. DFSI has previously submitted a comment on the proposed regulation. My identifying information is below. Thank you.

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