

July 16, 2009

Via U.S. Mail and Facsimile (415-556-0625)

James S. Cox
Vice President and Corporate Controller
Advent Software, Inc.
600 Townsend Street
San Francisco, California 94103

**Re: Advent Software, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2008
Filed March 12, 2009
File No. 0-26994
Response Letter Dated July 1, 2009**

Dear Mr. Cox:

We refer you to our comment letter dated June 17, 2009 regarding business contacts with Iran, Sudan, and Syria. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief
Office of Global Security Risk

cc: Barbara Jacobs
Assistant Director
Division of Corporation Finance