

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