

**Mail Stop 4561**

September 24, 2008

Tyler Wall, Esq. Vice President and General Counsel  
Brocade Communications Systems, Inc.  
1745 Technology Drive  
San Jose, CA 95110

**Re: Brocade Communications Systems, Inc.  
Registration Statement on Form S-4/A  
Filed September 23, 2008  
File No. 333-153205**

Dear Mr. Wall:

We have reviewed the above-captioned filing and have the following comments. Where indicated, we think you should revise your document in response to these comments.

General

1. The acknowledgments provided by the company in response to the closing comments of our September 16, 2008 letter should not deviate from the language used in our previous letter. Please provide these acknowledgments in a form consistent with the language used in our prior letter.

Exhibit 5.1

2. For equity securities, counsel must opine on the legality of the securities under the laws of the state in which the registrant is incorporated. Please have counsel file an updated legality opinion.

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Tyler Wall  
Brocade Communications Systems, Inc.  
September 24, 2008  
Page 2

Please contact Kevin Dougherty at (202) 551-3271 with any questions. If you require further assistance you may contact me at (202) 551-3397, or Barbara C. Jacobs, Assistant Director, at (202) 551-3735.

Sincerely,

Jay Ingram  
Staff Attorney

cc: Via Facsimile (650) 849-7400  
Nancy H. Wojtas, Esq.  
Cooley Godward Kronish LLP