

Mail Stop 4561

February 15, 2008

*By U.S. Mail and facsimile to (724) 514-9494*

James E. Cashman, Chief Executive Officer  
Ansys, Inc.  
Southpointe  
275 Technology Drive  
Canonsburg, PA 15317

**Re:   Ansys, Inc.  
      Definitive 14A  
      Filed April 9, 2007  
      File No. 000-20853**

Dear Mr. Cashman:

We have reviewed your December 13, 2007 response to our comments of November 30, 2007. Without more detail, we cannot agree or disagree with your conclusion that you have an appropriate basis to omit the identified performance targets. Since you are in possession of all of the facts related to your disclosure, we have decided that we have no basis to disagree with your decision to omit this information from your filing. As in all cases, we remind you that you are responsible for the adequacy and accuracy of the disclosure in your filings. We do not have any further comments on your filing.

If you have any further questions regarding our review of your filing, please call me at (202) 551-3397.

Sincerely,

Jay E. Ingram  
Senior Attorney