

June 17, 2010

Mr. James E. Cashman III  
President and CEO  
ANSYS, Inc.  
275 Technology Drive  
Canonsburg, PA 15317

Re: **ANSYS, Inc.**  
**Definitive Proxy Statement on Schedule 14A**  
**Filed on March 26, 2010**  
**File No. 000-20853**

Dear Mr. Cashman:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

David L. Orlic  
Staff Attorney

cc: Via facsimile: (617) 523-1231  
Joseph L. Johnson III, Esq.  
Goodwin Procter LLP