



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

October 22, 2020

Kenneth Stillwell
Chief Financial Officer and Chief Administrative Officer
Pegasystems Inc.
One Rogers Street
Cambridge, MA 02142

Re: Pegasystems Inc.
Form 10-K for the Fiscal Year Ended December 31, 2019
Filed February 12, 2020
Form 10-Q for the Quarterly Period Ended June 30, 2020
Filed July 28, 2020
File No. 001-11859

Dear Mr. Stillwell:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Technology