

Room 4561

March 23, 2007

Mr. Ronald J. Fior  
Chief Financial Officer and Vice  
President, Finance  
Callidus Software Inc.  
160 West Santa Clara Street, Suite 1500  
San Jose, CA 95113

**Re: Callidus Software Inc.  
Form 10-K for Fiscal Year Ended December 31, 2005  
File No. 000-50463**

Dear Mr. Fior:

We have completed our review of your Form 10-K for the year ended December 31, 2005 and have no further comments at this time.

Very truly yours,

Mark Kronforst  
Accounting Branch Chief