



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4561

July 7, 2017

Daniel Lender  
Chief Financial Officer  
QAD Inc.  
100 Innovation Place  
Santa Barbara, CA 93108

**Re: QAD Inc.**  
**Form 10-K for the Fiscal Year Ended January 31, 2017**  
**Filed April 7, 2017**  
**File No. 001-35013**

Dear Mr. Lender:

We have completed our review of your filing. 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,

/s/ Kathleen Collins

Kathleen Collins  
Accounting Branch Chief  
Office of Information Technologies  
and Services