

Mail Stop 4561

April 27, 2010

Ahmed Rubaie
Chief Financial Officer
Ariba, Inc.
11625 Rainwater Drive
Alpharetta, GA 30004

Re: Ariba, Inc.
Form 10-K for the Fiscal Year Ended September 30, 2009
File No. 000-26299

Dear Mr. Rubaie:

We have completed our review of your Form 10-K and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Patrick Gilmore
Accounting Branch Chief