



DIVISION OF
CORPORATION FINANCE

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

April 4, 2013

Via Facsimile

Ms. Sydney L. Carey
Chief Financial Officer
TIBCO Software Inc.
3303 Hillview Avenue
Palo Alto, CA 94304

Re: TIBCO Software Inc.
Form 10-K for the Fiscal Year Ended November 30, 2012
Filed January 28, 2013
File No. 000-26579

Dear Ms. Carey:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Patrick Gilmore

Patrick Gilmore
Accounting Branch Chief