

Mail Stop 4561

April 24, 2009

Mr. Kevin P. Shone  
Senior Vice President and Chief Financial Officer  
Unica Corporation  
170 Tracer Lane  
Waltham, MA 02451-1379

**Re: Unica Corporation**  
**Form 10-K for the Fiscal Year Ended September 30, 2008**  
**Filed December 15, 2008**  
**Form 10-Q for the Quarterly Period Ended December 31, 2008**  
**Filed February 9, 2009**  
**File No. 000-51461**

Dear Mr. Shone:

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,

Stephen Krikorian  
Accounting Branch Chief