

Mail Stop 4561

September 8, 2009

Michael J. Ruane, Chief Financial Officer
SunGard Capital Corp.
SunGard Capital Corp. II
680 East Swedesford Road
Wayne, PA 19087

**Re: SunGard Capital Corp.
Amendment No. 1 to Registration Statement on Form 10
Filed June 26, 2009
File No. 000-53653**

**SunGard Capital Corp. II
Amendment No. 1 to Registration Statement on Form 10
Filed June 26, 2009
File No. 000-53654**

**SunGard Data Systems Inc.
Form 10-K for the Fiscal Year Ended December 31, 2008
Filed March 6, 2009
File No. 001-12989**

Dear Mr. Ruane:

We have completed our review of the Forms 10 for SunGard Capital Corp. and SunGard Capital Corp. II, and for the Form 10-K for Fiscal Year Ended December 31, 2008 filed by SunGard Data Systems, Inc. We have no further comments on these filings at this time.

Sincerely,

Matthew Crispino
Staff Attorney

cc: Via Facsimile (617) 951-7050
Julie H. Jones, Esq.
Thomas Holden, Esq.
Ropes & Gray LLP