

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
April 13, 2012**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES EXCHANGE ACT OF 1934**

**SunGard Capital Corp.  
File No. 000-53653  
SunGard Capital Corp. II  
File No. 000-53654  
SunGard Data Systems Inc.  
File No. 001-12989  
CF#27242**

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SunGard Capital Corp., SunGard Capital Corp. II, and SunGard Data Systems Inc. submitted an application under Rule 24b-2 requesting confidential treatment for information they excluded from the Exhibits to a Form 10-Q filed on August 10, 2011.

Based on representations by SunGard Capital Corp., SunGard Capital Corp. II, and SunGard Data Systems Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit will not be released to the public for the time period specified:

Exhibit 10.1                      through April 1, 2013

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Pamela Howell  
Special Counsel