



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 4628

October 16, 2018

Via E-mail

Brian Swartz
Chief Financial Officer
Cornerstone OnDemand, Inc.
1601 Cloverfield Blvd., Suite 620
Santa Monica, California 90404

**Re: Cornerstone Ondemand, Inc.
10-K for Fiscal Year Ended December 31, 2017
Filed February 27, 2018
File No. 1-35098**

Dear Mr. Swartz:

We refer you to our comment letter dated September 18, 2018, regarding business contacts with North Korea, Sudan and Syria. We have completed our review of this subject matter. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Barbara Jacobs
Assistant Director
Division of Corporation Finance

Adam Weiss
Chief Administrative Officer & General Counsel
Cornerstone OnDemand, Inc.