

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
May 19, 2009**

**ORDER GRANTING CONFIDENTIAL TREATMENT
UNDER THE SECURITIES ACT OF 1933**

SolarWinds, Inc.

File No. 333-149851 - CF#21850

SolarWinds, Inc. submitted an application under Rule 406 requesting confidential treatment for information it excluded from the Exhibits to a Form S-1 filed on March 21, 2008, as amended.

Based on representations by SolarWinds, 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 exhibits will not be released to the public for the time periods specified:

Exhibit 10.27	through March 31, 2010
Exhibit 10.29	through March 31, 2010

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

Barbara C. Jacobs
Assistant Director