



DIVISION OF  
CORPORATION FINANCE

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

August 27, 2020

Kyle Badger  
Senior Vice President, General Counsel and Secretary  
Agilysys, Inc.  
1000 Windward Concourse, Suite 250  
Alpharetta, GA 30005

**Re: Agilysys, Inc.**  
**Registration Statement on Form S-3**  
**Filed August 24, 2020**  
**File No. 333-248273**

Dear Mr. Badger:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Michael C. Foland at (202) 551-6711 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology

cc: David Huntington