

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
March 27, 2013**

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

**SunGard Capital Corporation  
File No. 000-53653  
SunGard Capital Corporation II  
File No. 000-53654  
SunGard Data Systems Inc.  
File No. 001-12989**

**CF#29228**

---

SunGard Capital Corporation, SunGard Capital Corporation II, and SunGard Data Systems Inc. submitted an application under Rule 24b-2 requesting an extension of a previous grant of confidential treatment for information it excluded from the Exhibits to a Form 10-Q filed on August 9, 2011.

Based on representations by SunGard Capital Corporation, SunGard Capital Corporation 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, 2016

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

Pamela Howell  
Special Counsel