

Mail Stop 4561

June 22, 2009

Peter Karmanos, Jr.
Chief Executive Officer
Compuware Corporation
One Campus Martius
Detroit, MI 48226-5099

**Re: Compuware Corporation
Amendment No. 1 to Preliminary Proxy Statement on Schedule 14A
Filed June 17, 2009
File No. 000-20900**

Dear Mr. Karmanos:

We have completed our review of your revised filing and response letter, and have no further comments at this time on the specific issues raised.

Sincerely,

Mark P. Shuman
Branch Chief - Legal

cc: Via Facsimile (313) 227-7690
Daniel S. Follis, Jr.
Vice President, General Counsel and Secretary
Phone: (313) 227-7873