



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

Mail Stop 4561

November 30, 2009

Pat Goebel  
Chief Executive Officer  
Forgent Networks, Inc. d/b/a Asure Software  
108 Wild Basin Road  
Austin, TX 78746

**Re: Forgent Networks, Inc. d/b/a Asure Software  
Preliminary Revised Proxy Statement on Schedule 14A  
Filed November 24, 2009  
File No. 001-34522**

Dear Mr. Liguori:

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

Sincerely,

Maryse Mills-Apenteng  
Special Counsel

cc: Via facsimile: (646) 390-6784  
David Sandberg