

Room 4561  
Via fax – 972-8-9382730

December 23, 2008

Roni Giladi  
Chief Financial Officer  
Sapiens International Corporation N.V.  
Rabin Science Park  
Nes Ziona 74140 Israel

**Re: Sapiens International Corporation N.V.  
Form 20-F for the Fiscal Year Ended December 31, 2007  
Filed June 25, 2008  
File no. 0-20181**

Dear Mr. Giladi:

We have completed our review of your Form 20-F and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins  
Accounting Branch Chief