

July 20, 2007

Room 4561

Mr. John G. Schwarz  
Chief Executive Officer  
Business Objects S.A.  
157-159 rue Anatole France,  
92300 Levallois-Perret, France

**Re: Business Objects S.A.  
Form 10-K for Fiscal Year Ended December 31, 2006  
Filed March 1, 2007  
Form 10-Q for the Quarter Ended March 31, 2007  
Filed May 10, 2007  
File No. 000-24720**

Dear Mr. Schwarz:

We have reviewed the above-referenced filings and have the following comments. Please note that we have limited our review to the matters addressed in the comments below. We may ask you to provide us with supplemental information so we may better understand your disclosure. Please be as detailed as necessary in your explanation. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 10-K for the Fiscal Year Ended December 31, 2006

Consolidated Financial Statements

Consolidated Statements of Income, page 63

1. Please tell us where you classify product and service revenues that are bundled and recognized ratably due to lack of VSOE and those that are recognized using contract accounting. If these revenues are allocated to your product and service line items, describe the basis for those allocations. In addition, tell us how these product and service classifications comply with Rule 5-03 of Regulation S-X.

Form 10-Q for the Quarter Ended March 31, 2007

Consolidated Financial Statements

Notes to Consolidated Financial Statements

13. Income Taxes, page 18

2. Please explain to us, in detail, how you have met each of the disclosure requirements in paragraph 21.d of FIN 48. In addition, explain to us how you evaluated the matter related to the transfer of intellectual property to your Irish subsidiary before and after adoption of the FIN.

\* \* \* \* \*

Please respond to these comments within 10 business days or tell us when you will provide us with a response. Please submit all correspondence and supplemental materials on EDGAR as required by Rule 101 of Regulation S-T. If you amend your filing(s), you may wish to provide us with marked copies of any amendment to expedite our review. Please furnish a cover letter that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing any amendment and your responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

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In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

You may contact David Edgar, Staff Accountant, at (202) 551-3459 or me at (202) 551-3451 if you have any questions regarding these comments.

Sincerely,

Mark Kronforst  
Accounting Branch Chief