



DIVISION OF  
CORPORATION FINANCE

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

May 12, 2023

Scott Behrens  
Chief Financial Officer  
ACI Worldwide, Inc.  
2811 Ponce de Leon Blvd, PH1  
Coral Gables, FL 33134

**Re: ACI Worldwide, Inc.**  
**Form 10-K for the Fiscal Year ended December 31, 2022**  
**Filed March 1, 2023**  
**File No. 000-25346**

Dear Scott Behrens:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Energy & Transportation