

April 13, 2023

Chantelle Breithaupt
Chief Financial Officer
Aspen Technology, Inc.
20 Crosby Drive
Bedford, Massachusetts 01730

Inc.

Transition Period from October 1, 2021 to June 30, 2022

Re: Aspen Technology,
Form 10-KT for the
File No. 001-41400

Dear Chantelle Breithaupt:

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 Technology