

March 28, 2022

Antonio Pietri  
President and Chief Executive Officer  
Aspen Technology, Inc.  
20 Crosby Drive  
Bedford, MA 01730

Inc.

Fiscal Year Ended June 30, 2021  
2021

Re: Aspen Technology,  
Form 10-K for  
Filed August 18,  
File No. 001-34630

Dear Mr. Pietri:

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

cc:

Frederic Hammond