Mail Stop 4561

Via fax (469) 357-6566

November 8, 2007

Pallab Chatterjee Interim CEO i2 Technologies, Inc. One i2 Place 11701 Luna Road Dallas, TX 75234

> Re: i2 Technologies, Inc. Form 10-K for the Fiscal Year Ended December 31, 2006 Filed March 30, 2007 Form 8-K Filed May 1, 2007 File No. 000-50327

Dear Mr. Chatterjee:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Kathleen Collins Accounting Branch Chief