Mail Stop 4561

Via fax (469) 357-6566

October 5, 2009

Jackson L. Wilson Chairman & CEO i2 Technologies, Inc. 11701 Luna Road Dallas, TX 75234

> Re: i2 Technologies, Inc. Form 10-K for the Fiscal Year Ended December 31, 2008 Filed March 12, 2009 Form 10-Q for the Quarterly Period Ended June 30, 2009 Filed August 7, 2009 File No. 000-50327

Dear Mr. Wilson:

We have completed our review of your Form 10-K and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins Accounting Branch Chief