

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

October 17, 2023

Kenneth Stillwell Chief Financial Officer Pegasystems Inc. One Main Street Cambridge, MA 02142

Re: Pegasystems Inc.

Form 10-K for the Year Ended December 31, 2022 Filed February 15, 2023 Form 10-Q for the Three Months Ended June 30, 2023 Filed July 26, 2023 File no. 001-11859

Dear Kenneth Stillwell:

We have completed our review of your filings. 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: Efstathios Kouninis