

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

DIVISION OF CORPORATION FINANCE

July 23, 2013

<u>Via Facsimile</u> Robert J. Krakauer Executive Vice President and Chief Financial Officer Aspect Software Group Holdings Ltd. 300 Apollo Drive Chelmsford, Massachusetts 01824

> Re: Aspect Software Group Holdings Ltd. Form 10-K for Fiscal Year Ended December 31, 2012 Filed February 22, 2013 File No. 33-170936-05

Dear Mr. Krakauer:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Craig D. Wilson for

Stephen G. Krikorian Accounting Branch Chief