Mail Stop 4561

February 23, 2009

Peter Karmanos, Jr. Chief Executive Officer Compuware Corporation One Campus Martius Detroit, MI 48226-5099 *Also via facsimile at: (313) 227-1822*

> Re: Compuware Corporation Form 10-K for the Fiscal Year Ended March 31, 2008 Filed on May 30, 2008 Form 10-Q for the Quarterly Period Ended September 30, 2008 Filed on November 7, 2008 File No. 000-20900

Dear Mr. Karmanos:

We have completed our review of your Form 10-K and related filings and your response letter dated February 10, 2009, and we have no further comments at this time on the specific issues raised.

Sincerely,

Barbara C. Jacobs Assistant Director