



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

Mail Stop 4561

November 30, 2009

Pat Goebel
Chief Executive Officer
Forgent Networks, Inc. d/b/a Asure Software
108 Wild Basin Road
Austin, TX 78746

**Re: Forgent Networks, Inc. d/b/a Asure Software
Preliminary Revised Proxy Statement on Schedule 14A
Filed November 24, 2009
File No. 001-34522**

Dear Mr. Liguori:

We have completed our review of your filing and have no further comments at this time on the specific issues raised.

Sincerely,

Maryse Mills-Apenteng
Special Counsel

cc: Via facsimile: (646) 390-6784
David Sandberg