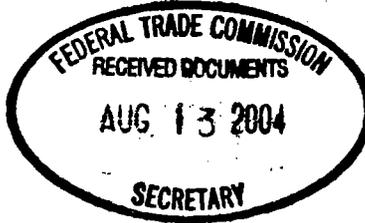


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August 13, 2004

BY HAND DELIVERY

U.S. Federal Trade Commission
Office of the Secretary
600 Pennsylvania Ave. N.W.
Washington, D.C. 20580

Diana L. Dietrich
202.639.7726
FAX 202.585.1083
diana.dietrich@bakerbotts.com

Re: In the Matter of Aspen Technology, Inc. (Docket No. 9310)

Dear Mr. Clark:

Heat Transfer Research, Inc. ("HTRI") is writing to comment on the proposed consent order ("Order") announced in the above-referenced proceeding on July 15, 2004. HTRI develops and markets thermal design software for use in the process industries, which products it intends to interface with Respondent's HYSYS and Aspen Plus software. As such, HTRI is a "Third-party Developer" as that term is defined in paragraph I. FF. of the Order.

HTRI's comment concerns paragraph IV. B. of the Order. This paragraph sets out an interface publication requirement, but does not make clear what minimum, meaningful level of publication must occur to satisfy the requirement. To remedy this deficiency and to ensure that the intent of the Order can be achieved, HTRI proposes that language be added to this paragraph to specify that "publish" means, at a minimum, to make publicly and obviously available on an unrestricted, ongoing basis on Aspen Technology Inc.'s website.

Thank you for your consideration of this comment.

Sincerely yours,

A handwritten signature in cursive script that reads "Claudette D. Beyer".

Claudette D. Beyer
President & Chief Executive Officer
Heat Transfer Research, Inc.

Diana Dietrich
Baker Botts L.L.P.
Counsel for Heat Transfer Research, Inc.