

Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE  
NEW YORK, NY 10017-3954

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TELEPHONE: +1-212-455-2000

FACSIMILE: +1-212-455-2502

Direct Dial Number  
+1-212-455-2812

E-mail Address  
rfenyes@stblaw.com

VIA EDGAR

November 10, 2020

Re: Acceleration Request for Bentley Systems, Incorporated  
Registration Statement on Form S-1 (File No. 333-250002)

Division of Corporation Finance  
Office of Technology  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
c/o Jeffrey Kauten

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, we attach the requests of our client, Bentley Systems, Incorporated, and of the underwriters that effectiveness of the above-referenced Registration Statement be accelerated to 4:00 p.m., New York, NY time, on November 12, 2020, or as soon as practicable thereafter. **We ask, however, that the Securities and Exchange Commission staff not accelerate such effectiveness until we speak with you on that date.**

Please call me at (212) 455-2812 with any questions.

Very Truly yours,

/s/ Richard A. Fenyes

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Richard A. Fenyes

cc: Bentley Systems, Incorporated  
Gregory S. Bentley  
David J. Hollister  
David R. Shaman

Goodwin Procter LLP  
Richard A. Kline  
Sarah B. Axtell

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Re: Bentley Systems, Incorporated  
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File No. 333-250002

Division of Corporation Finance  
Office of Technology  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
c/o Jeffrey Kauten

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Bentley Systems, Incorporated (the "Company") hereby requests that the effective date of the above-referenced Registration Statement be accelerated so that it may become effective at 4:00 p.m., New York, NY time, on November 12, 2020, or as soon as possible thereafter. In this regard, the Company is aware of its obligations under the Securities Act.

[Signature Page Follows]

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Very truly yours,

BENTLEY SYSTEMS, INCORPORATED

By: /s/ David R. Shaman

Name: David R. Shaman

Title: Chief Legal Officer and Corporate Secretary

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