

Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE  
NEW YORK, NY 10017-3954

---

TELEPHONE: +1-212-455-2000

TELEPHONE: +1-212-455-2000

Direct Dial Number  
+1-212-455-2812

E-mail Address  
rfeny@stblaw.com

VIA EDGAR

September 18, 2020

Re: Acceleration Request for Bentley Systems, Incorporated  
Registration Statement on Form S-1 (File No. 333-248246)

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 September 22, 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

Richard A. Fenyes

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

Simpson Thacher & Bartlett LLP  
Jonathan R. Ozner

Goodwin Procter LLP  
Richard A. Kline  
Sarah B. Axtell

---