

November 10, 2020

VIA EDGAR

Re: 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, 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]

---

Very truly yours,

BENTLEY SYSTEMS, INCORPORATED

By: /s/ David R. Shaman

---

Name: David R. Shaman

Title: Chief Legal Officer and Corporate Secretary

---