UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

IN THE MATTER OF	)	
MSC.SOFTWARE CORPORATION,	)	Docket No. 9299
a corporation.	)	

ANSWER OF MSC.SOFTWARE CORPORATION

Respondent MSC.Software Corporation ("MSC") answers the Federal Trade Commission's Administrative Complaint ("Complaint") as set forth below:

INTRODUCTION

[redacted]

RESPONDENT MSC.SOFTWARE CORPORATION

1. MSC admits the allegations of paragraph 1

[redacted]

revenues of approximately $178 million. MSC admits that it has developed and sold a product called MSC.NASTRAN to some customers who design, manufacture, and/or sell aerospace, automotive, and other manufactured products. MSC denies the remaining allegations of paragraph 2.

3. MSC admits the allegations of paragraph 3.

[redacted]

11. MSC admits that "finite element analysis" ("FEA") may be used – but does not have

[redacted]

paragraph 11.

[redacted]

RELEVANT PRODUCT MARKETS

21. MSC denies the allegations of paragraph 21.

22. MSC denies the allegations of paragraph 22.

23. MSC denies the allegations of paragraph 23.

RELEVANT GEOGRAPHIC MARKETS

24. MSC denies the allegations of paragraph 24(a) and admits that the relevant

COUNT II

THE ACQUISITIONS CONSTITUTE UNLAWFUL MONOPOLIZATION IN VIOLATION OF FTC ACT § 5

[redacted]

33. MSC denies the allegations of paragraph 33.

34. MSC denies the allegations of paragraph 34.

35. MSC denies the allegations of paragraph 35.

COUNT III

THE ACQUISITIONS CONSTITUTE AN UNLAWFUL ATTEMPT TO MONOPOLIZE IN VIOLATION OF FTC ACT § 5

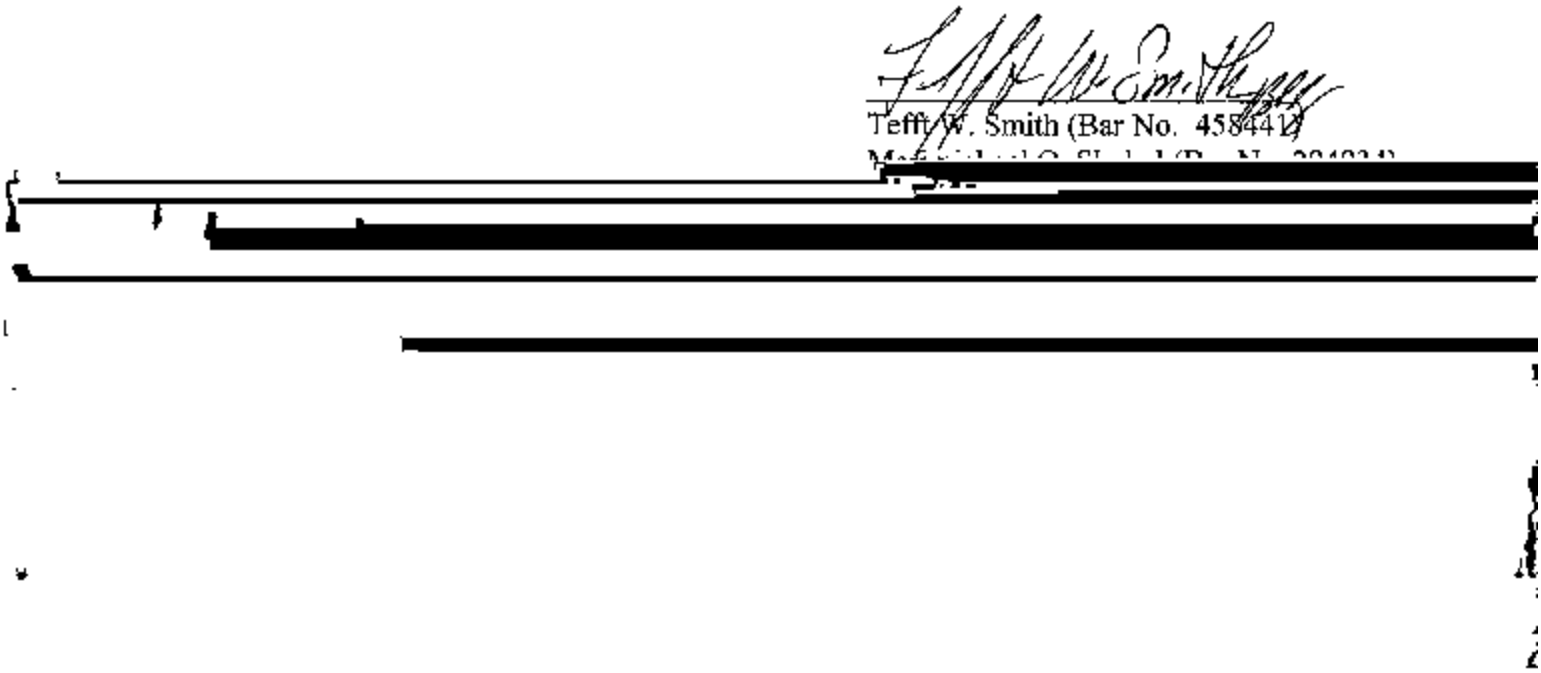
[redacted]

NOTICE OF CONTEMPLATED RELIEF

42. This section does not contain any factual averments; therefore, it does not require a response, except that MSC denies that the Commission is entitled to any relief.

Dated: October 30, 2001

Respectfully submitted,



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Counsel for Respondents,
MSC.Software Corporation

CERTIFICATE OF SERVICE

This is to certify that on October 30, 2001, I caused a copy of the attached Answer of MSC.Software Corporation to be served upon the following persons by hand:

D. Michael Chappell
Administrative Law Judge
[redacted]
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Richard B. Dagen, Esquire
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Federal Trade Commission
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