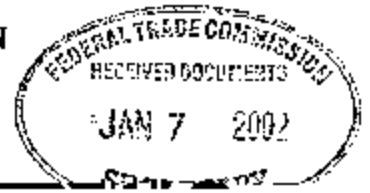


UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION



In the Matter of

MSC SOFTWARE CORPORATION,
a corporation.

**MSC'S RESPONSE TO ANSYS'S MOTION FOR AN EXTENSION OF
TIME TO EITHER RESPOND OR MOVE TO QUASH SUBPOENA DUCES TECUM**

recognizes and is satisfied as the fact that the amount of the ...

[REDACTED]

2.1

2.1




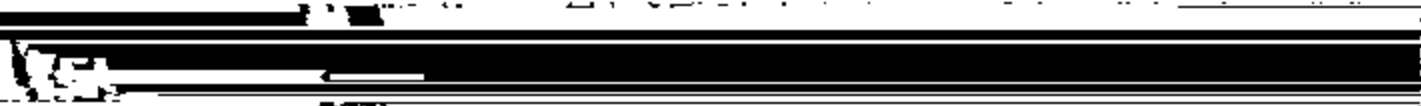
[REDACTED]

[REDACTED]

[REDACTED]

2.1

documents prepared by ANSYS, of which MSC happened to obtain a copy in the ordinary course of business, demonstrates that:



toward MSC as a competitor and have confirmed that ANSYS would benefit competitively if Complaint Counsel wins this case. Since MSC served the subpoena on ANSYS – and even prior to

produce – as a starting point – those documents ANSYS previously offered to produce in its December 27, 2001 letter as part of its efforts to obtain a stipulated extension.³

I. BACKGROUND

MSC has been in contact with counsel for ANSYS since shortly after ANSYS's announcement that they had entered into a strategic relationship with Schaeffer Automated

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2002 – has already passed, yet ANSYS has not filed a motion to quash. Even if the Tribunal denies

ANSYS's motion, the time needed to prepare, respond, and resolve a motion to quash effectively

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ANCVS does not need the month of January to collect evidence and procedures are in place.

[REDACTED]

[REDACTED]

[REDACTED]

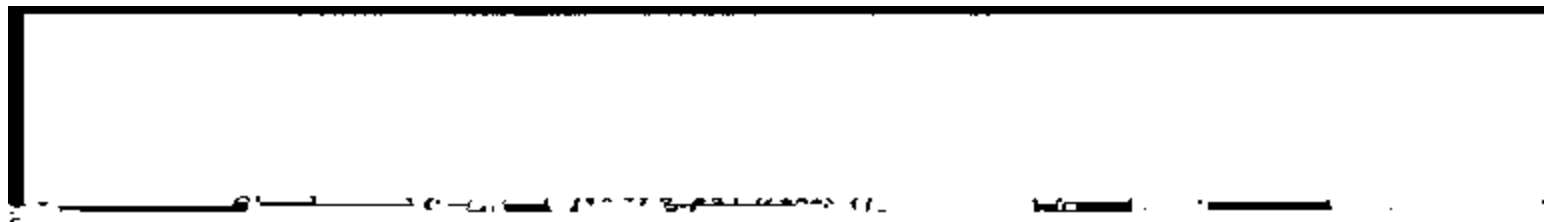
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



1977-1978

1979

1980

1981

1982

1983

1984

1985

1986

1987

1988

The prejudice associated with so short a discovery period for so complex a case is

Extension to January 31, 2009 to Implement Clean Air Act's Redwood

III. CONCLUSION

Because the time associated with the current Sched. 1 is 0.1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

resolve any outstanding issues concerning this subpoena; and (4) Order ANSYS to produce on a

US
"Choice"

ANSYS

Market Situation

Competition is a reality for

many companies

Market

costs

and warranty

change

in doing things

price!"

ANSYS

et Requirements

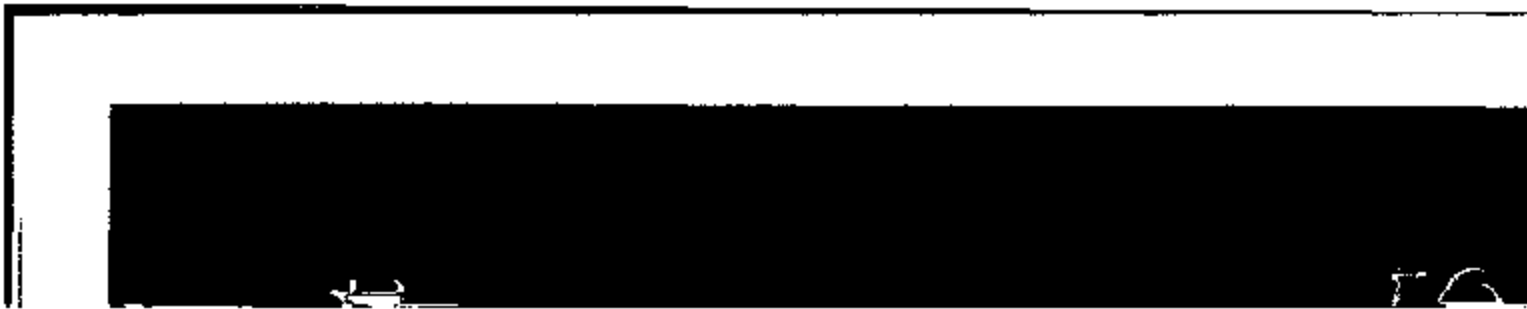
olve larger problems

tion costs

ustry adoption

ice!"

ANSYS



[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

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[Redacted]

[Redacted]

[Redacted]

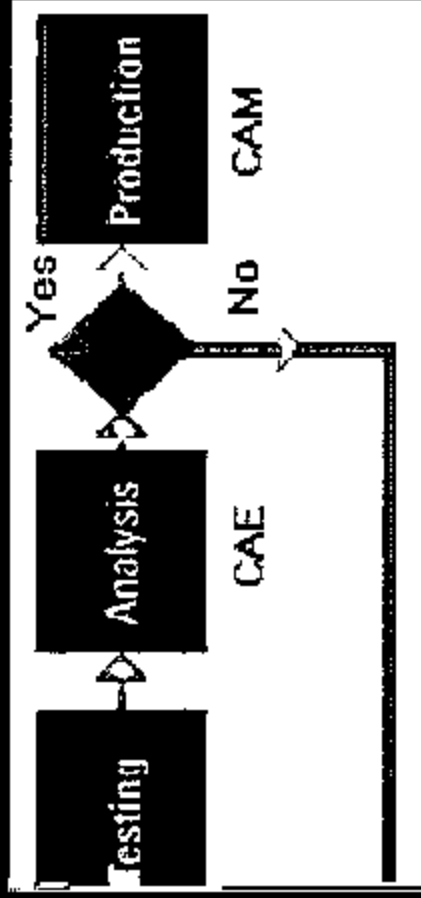
[Redacted]

III:

Interfaces
Peer Visits
Technology Sharing
Education

YS

Design Process



ANSYS

Design Process

ch

distinct, autonomous

ational structures

aterial savings

arket

ANSYS

Engineering

Physical
Prototype

Production

ization

ANSYS

engineering

accelerates time

broader user

is improves

engineering

ANSYS[®]

ogy

es (CAE tools)

ming tasks

cessor with solvers

er engineering tools such as

solvers to handle

ow and in the future)

s company-wide computer

ANSYS

ners

rs

AN SNYS

erview

nd Chief

une 1996

ANSYS

ANSYS Principles

"as a company... and a product"

- Open for business
- Fanatical commitment to quality
- Technological excellence
- Speed of execution
- Intuitive and productive solutions
- Power of choice

"The Power of Choice!"

ANSYS

Choose ANSYS:

of analysis problems -

break wall

highest quality from an

that develops products

of choice - their CAD

software platform(s), their

ANSYS

© ANSYS[®]

can't
in current.
ommitment
y standards.
enterprise-
verage existing

ANSYS

utors

(SD):

and support

wide

engineering

(es)

and services

INSYS

Products

a broad width of CAE

users

tools to high-end coupled

analyses

users

ability

ANSYS

Breadth of Capabilities

Structural

Thermal

Acoustics

Piezoelectric

Vibration

Electromagnetic

CFD

**MULTI-
PHYSICS**

Number of Choice!

ANSYS

ces

technical
ices through

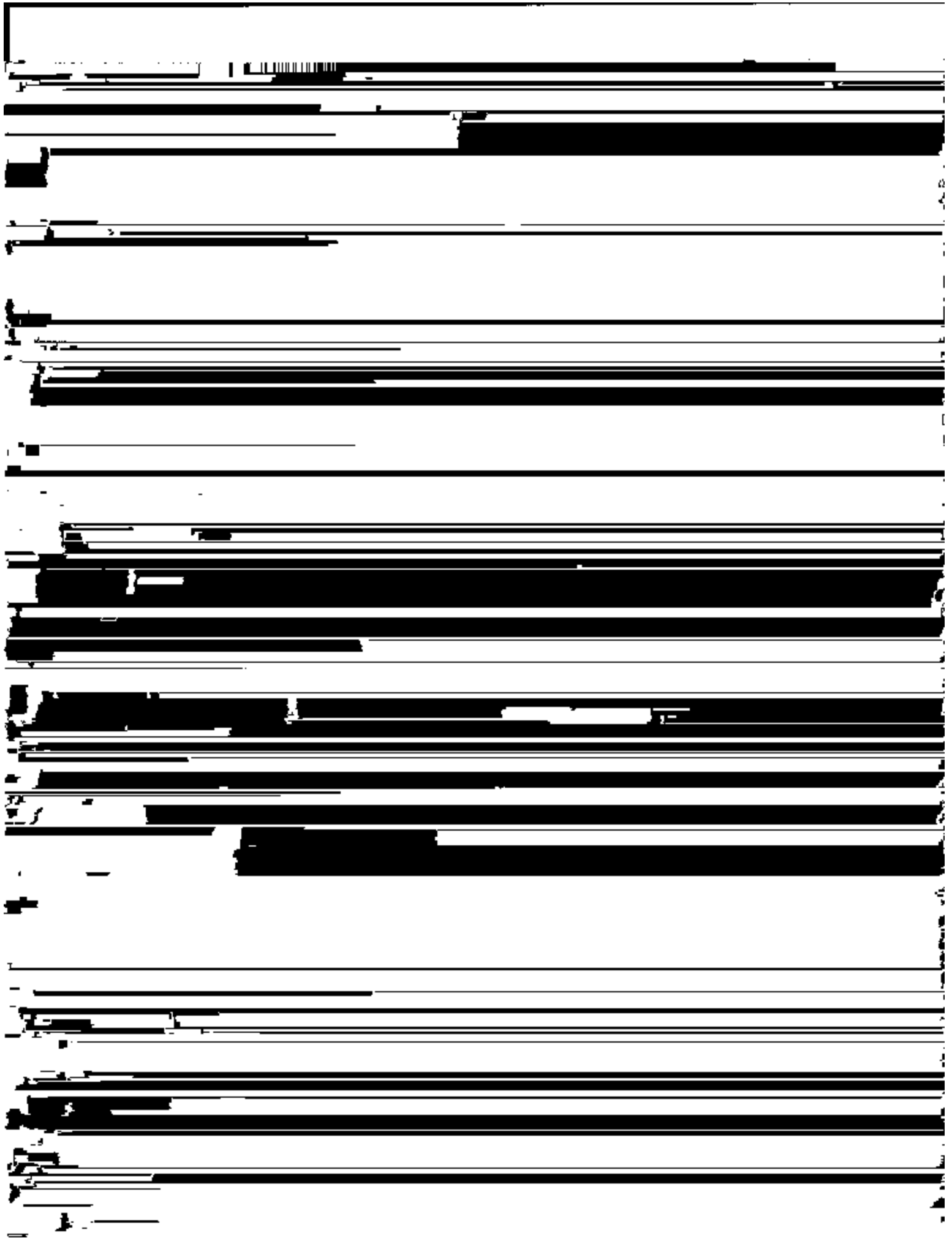
Customer
software updates,
maintenance, and

ANSYS

Myth vs. Reality

"The Power of Choice!"

ANSYS



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

nger

SM

h vs. Reality: MSC

et Perceptions:

N is the only CAE product with Broad
ics and Support in all FEA Technologies
orming analysis code for large models
ysis code for dynamics, superelements,
icity.

n as CAE Industry Experts - Strong Support

Choice!"

ANSYS

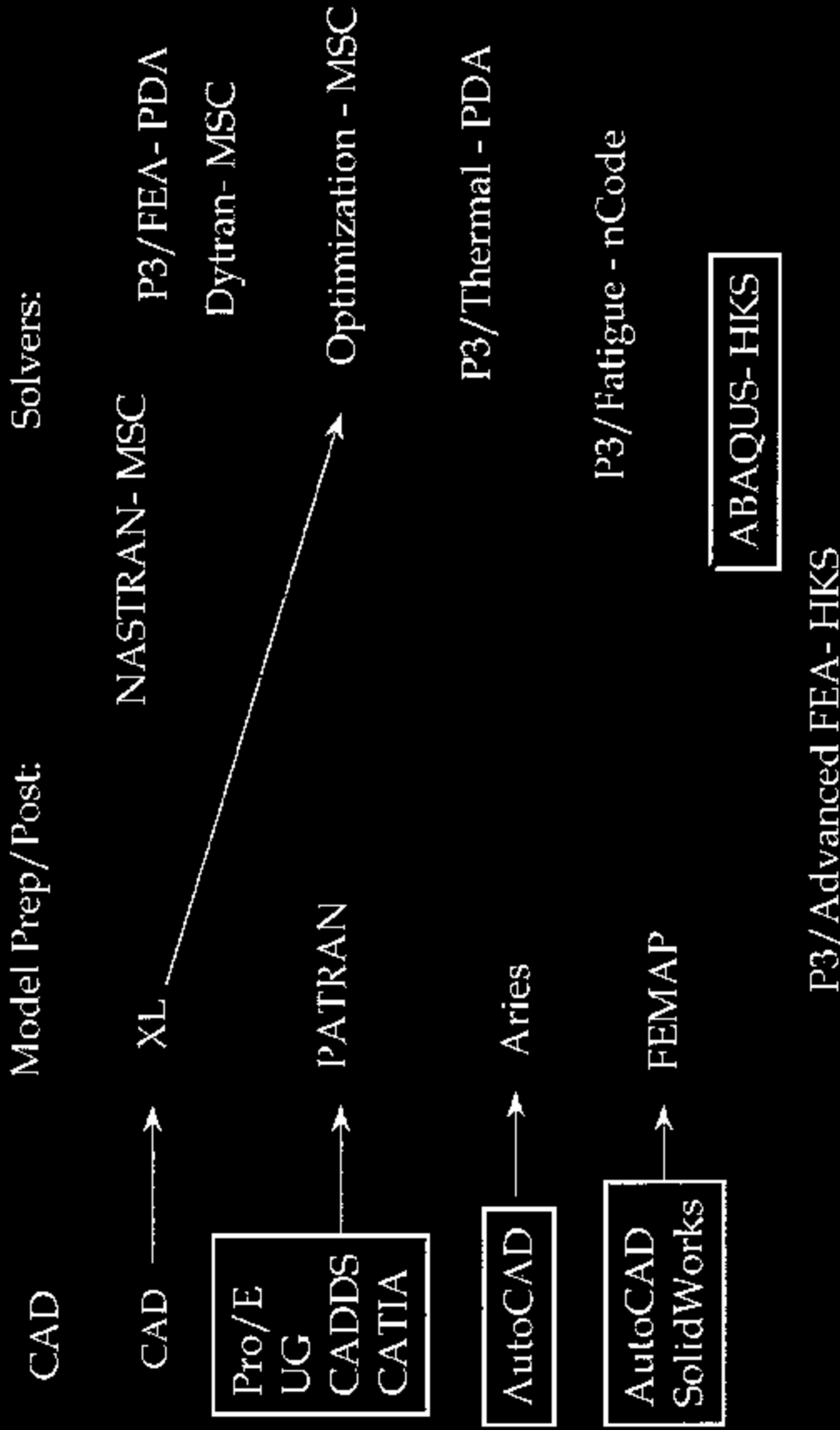
C

product
prep/post,
uct strategy

ystem IDs,
ng
each product

SYS[®]

MSC Product Map



P3/Advanced FEA- HKS

"The Power of Choice!"

ANSYS

Quality: ANSYS

user interface (GUI) across all Thermal, Electromagnetics, from low-end to high end systems (PCs to SuperComputers) and Supercomputers. The combination: Entry Level to Advanced capabilities provide a more

ANSYS

ANSYS

Needs: Pre, Post and
Design Optimization

in ASDs and ANSYS

ANSYS

ERP

ulation

YS
TRAN
BYNA

5,

NSYS

CAE Price/Functionality

ANSYS ABAQUS SDRC Cosmos Algor	MARC MSC
PTC/Mechanica CV	

\$5K

Cost

\$100K

Power of Choice!

ANSYS

Price/Performance

ABAQUS	MARC
MSC	MSC
ANSYS	ANSYS

Cost

\$100K

ANSYS

ceis

STYS
N

Take Model

in Pro/ENGINEER

MESH

ts

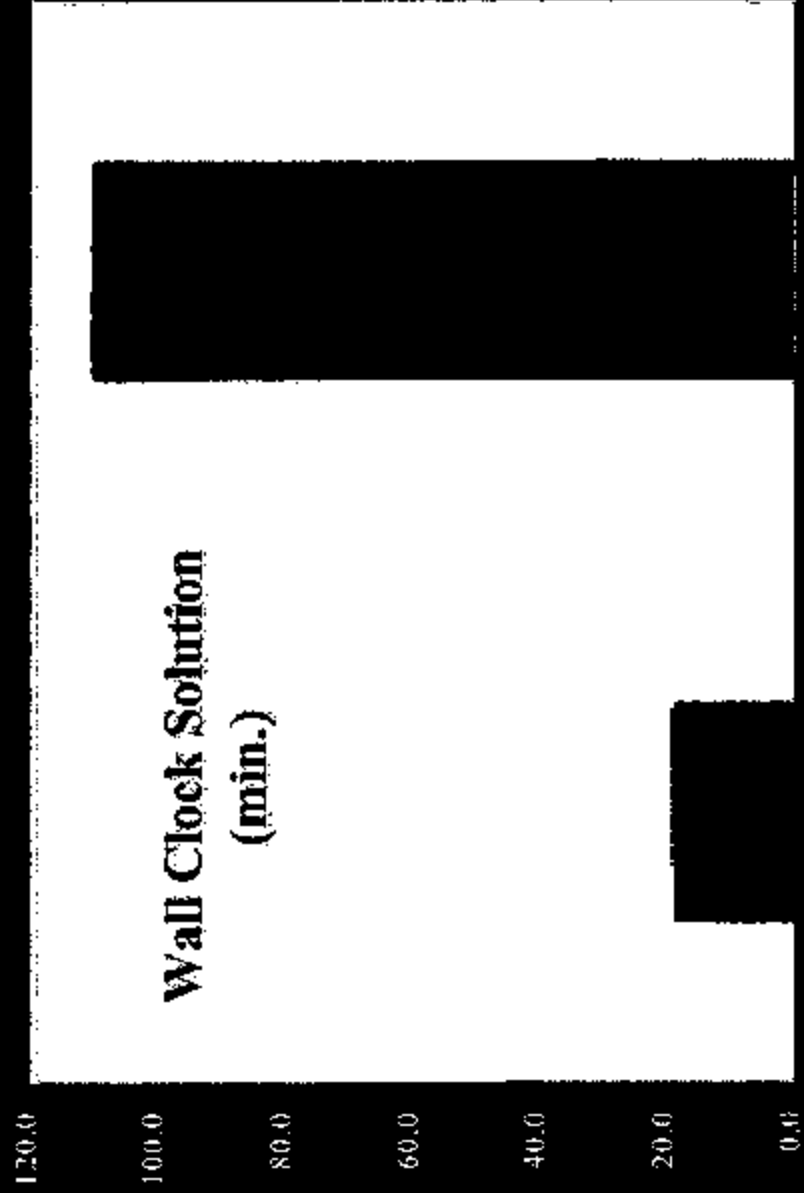
sis

er

YST

ANSYS

Pump Yoke Model



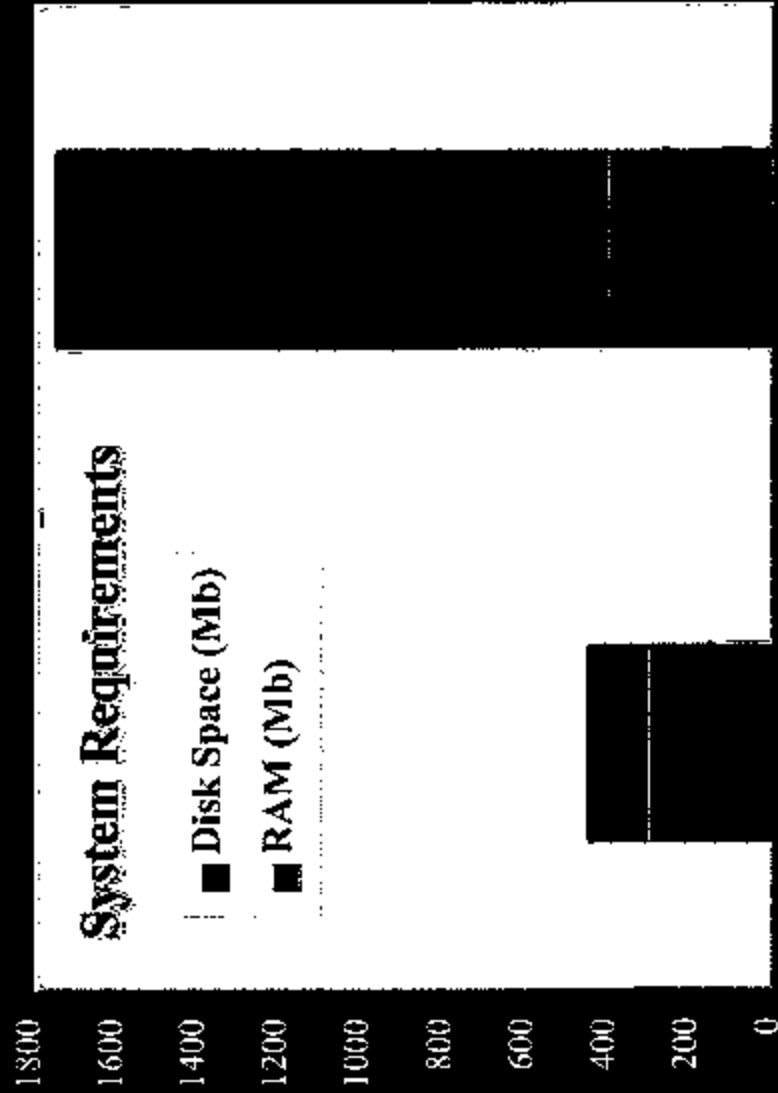
ANSYS 5.3

MSC/NASTRAN V69

ANSYS

"The Power of Choice!"

Pump Yoke Model



ANSYS 5.3

MSC/NASTRAN V69

ANSYS

"The Power of Choice!"



...et elements
OF

NSYS

05)

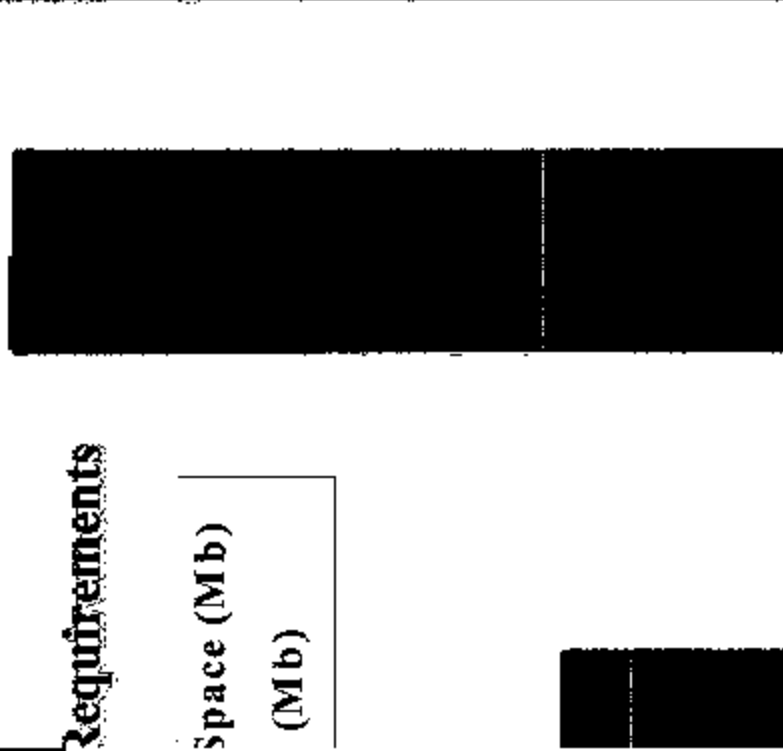
RAN V69

MSYS

er Model (-05)

Requirements

Space (Mb)
(Mb)



MS 5.3

MSC/NASTRAN V69

ANSYS

21"

Ice Rotor Model

8-node brick elements
73,575 DOF

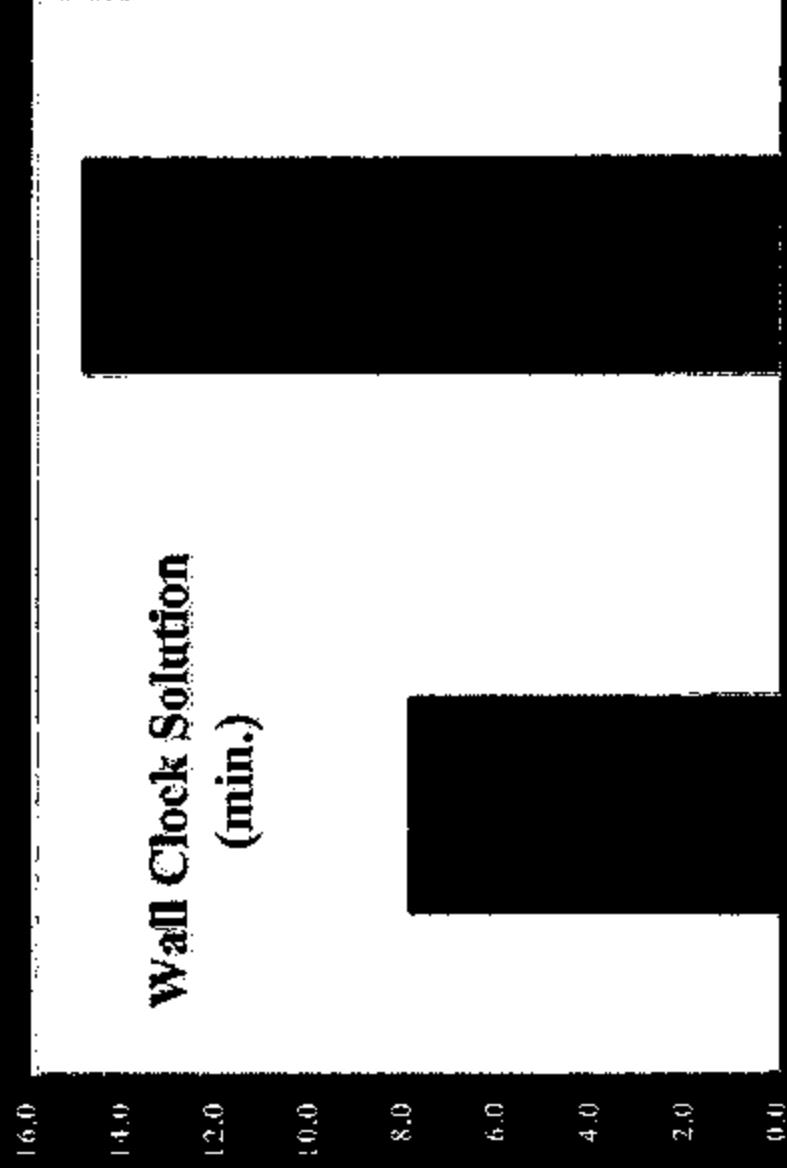
The ANSYS logo is displayed in a stylized, bold, sans-serif font. The letters 'A', 'N', 'S', 'Y', and 'S' are stacked vertically, with the 'S' at the top and the 'A' at the bottom. The letters are white against a black background.

ANSYS



Disk Brake Rotor Model

Iterative Solvers - Linear Static



ANSYS 5.3

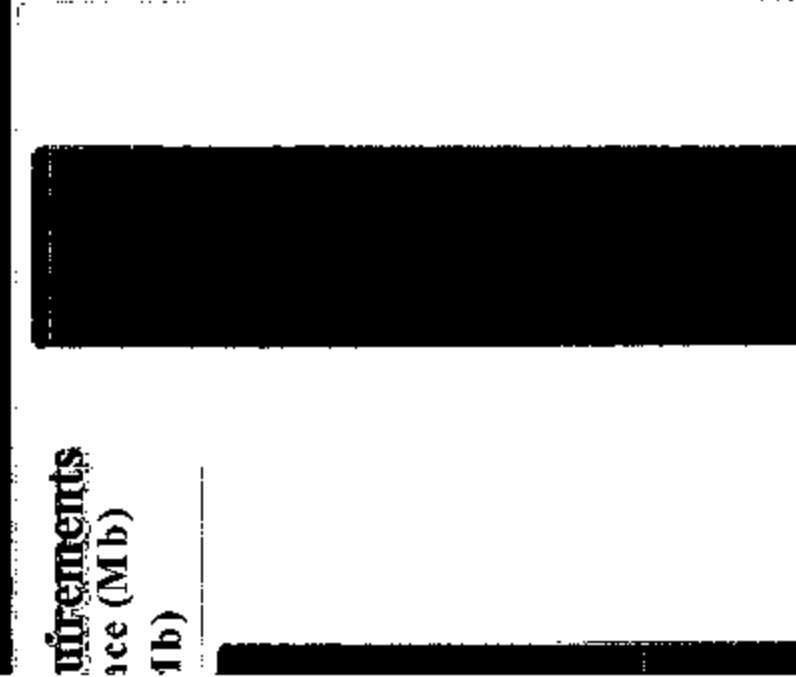
MSC/NASTRAN V69

"The Power of Choice!"

ANSYS

Large Rotor Model Users - Linear Static

Requirements
Space (Mb)
1b)



MSC/NASTRAN V69

ANSYS

Model
for Static

Work Solution
(in.)

STRAN V69

ANSYS

Large Rotor Model Users - Linear Static

System Requirements

- Disk Space (Mb)
- RAM (Mb)



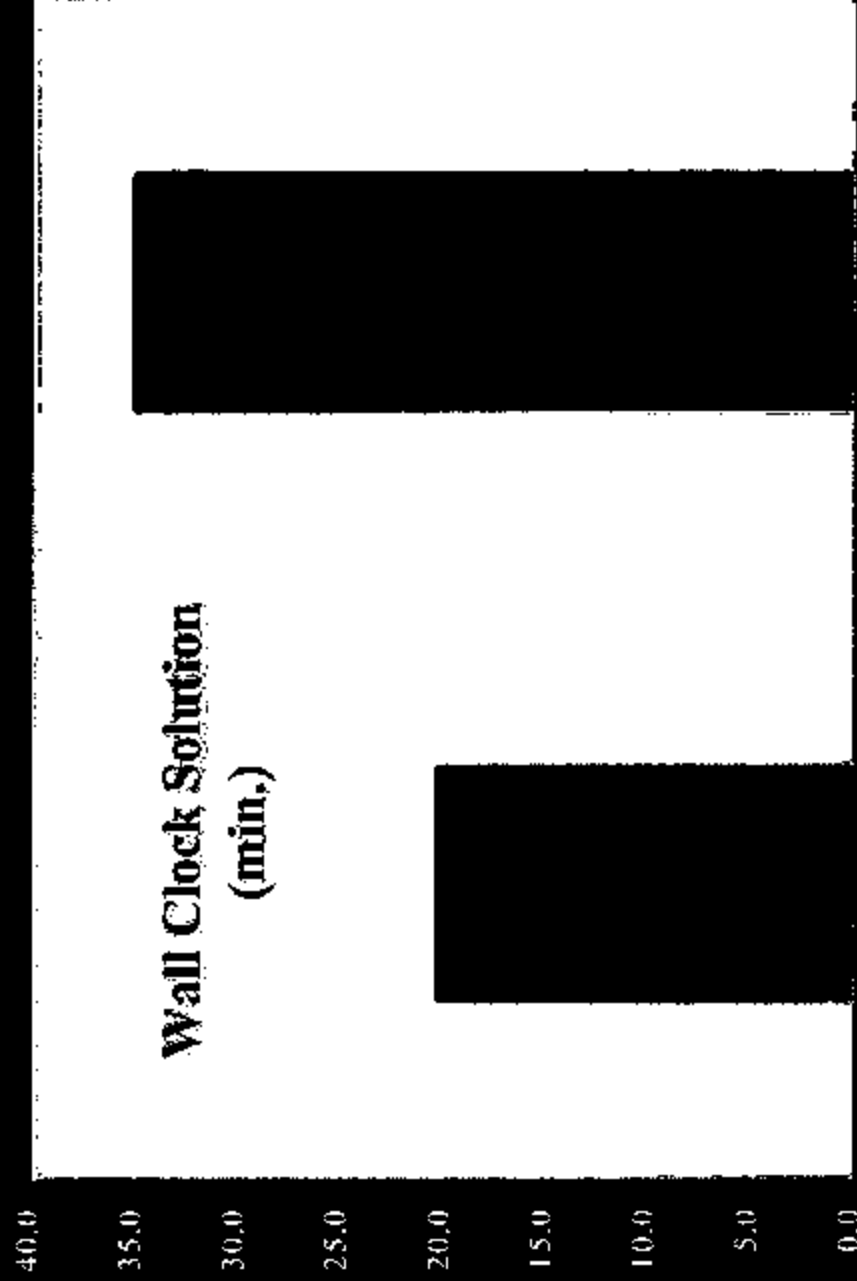
3 MSC/NASTRAN V69

feature

ANSYS

Disk Brake Rotor Model

Block Lanczos Modal Solvers



ANSYS 5.3

MSC/NASTRAN V69

ANSYS

"The Power of Choice!"

Model
Numbers



1969

NSYS[®]

Torpedo Tube & Tank Model



Shell elements
(quad dominant & tri)
71,472 DOF

"The Power of Choice!"

ANSYS

rank Model
ear Static

lock Solution
(min.)

SC/NASTRAN V69

ANSYS

Auto Tube & Tank Model Sparse Solvers - Linear Static

System Requirements

- Disk Space (Mb)
- RAM (Mb)



ANSYS 5.3

MSC/NASTRAN V69

“untuned” beta feature

“of Choice!”

ANSYS

Tube & Tank Model Panczos Modal Solvers

Wall Clock Solution
(min.)



Solver	Wall Clock Solution (min.)
Panczos	~1.5
MSC/Nastran V69	~10.5

YS 5.3

MSC/NASTRAN V69

ANSYS

ei™

del

SX

AD

try

5

Analysis

3C
7,500
35,000
30,000
NA
NA
NA
NA
20,000
92,500

JSYS

tegy

AD systems, your

h ASDs

l certification

ANSYS

The NEXT STEP!!!!

"The Power of Choice!"

ANSYS

The ANSYS Challenge

Develop a Quickstart program:

- Measure design process effectiveness versus industry averages using PQ Assessment
- Identify a project or product for proof of performance
- We'll Provide Professional Consultation
- We'll Provide Competitive Cost Analysis
- Identify the metrics for success
- Attend our customized training class
- Evaluate ANSYS for 60 - 90 days

Take a test drive and put ANSYS to the test!

"The Power of Choice!"

ANSYS[®]



SUBPOENA DUCES TECUM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RETURN OF SERVICE

I hereby certify that a duplicate original of the within subpoena was duly served: (check the method used)

- in person.*
- by registered mail.*

CERTIFICATE OF SERVICE

This is to certify that on December 18, 2001, I caused a copy of the attached Subpoena Duces Tecum Issued on Behalf of *MSC Software Corporation* to be sent via registered mail, upon the following persons for service:

ANSYS, Inc.
c/o David S. Secunda
South Pointe
275 Technology Drive
Canonburg, PA 15317

ANSYS, Inc.
c/o CT Corporation System
1515 Market Street
Suite 1210
Philadelphia, PA 19102

~~Witnessed and signed on December 18, 2001 at Philadelphia, Pennsylvania~~

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

6. All documents relating to SAS, Harry G. Schaeffer, Richard H. McNeal, or Michael J. Krauski.
7. All documents relating to Nastran-based FEA solvers.
8. All documents relating to any communications with any third-party concerning MSC's

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. All documents relating to switching, including shifts in utilization, between or among any

Network Provider or Service Provider, or any other person, including the utilization of

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

includes electronic correspondence and drafts of documents, copies of documents that are

on electronic or electronic storage of data

[REDACTED]

include maintenance log files updates initialization media transfer

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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entirety by including all attachments and all pages, regardless of whether they directly relate

[REDACTED]

12

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- (b) the record length and block size ; and
- (c) the record layout, including the name of each element, the element's size in bytes, and the element's data type.

The documentation should be included in the same package as the storage media, along with a printout of the first 100 records in report format.

- d. Shipping. Magnetic media should be carefully packed to avoid damage, and must be shipped clearly marked: **MAGNETIC MEDIA DO NOT X-RAY.**
 - e. Virus Checks: Media will be scanned for computer viruses. Infected media will be returned for replacement.
6. As to Specification No. 26, submit all computer data in machine readable form in Excel (.xls) 2000 or prior version, or Lotus compatible (.wk1) format, or in ASCII delimited format.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

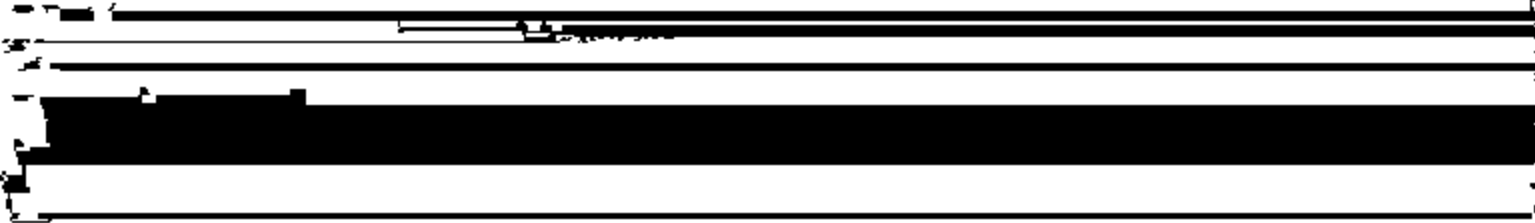
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15. To furnish a complete response, the person supervising compliance with this Subpoena must submit a signed and notarized copy of the attached verification form along with the



VERIFICATION

I personally supervised the preparation and assembly of this response in accordance with the Definitions and Instructions set forth in Subpoena *Duces Tecum* Issued on Behalf of Respondent MSC.Software Corporation in *MSC.Software Corporation*, Docket No. 9299. All copies submitted in lieu of originals are true, correct and complete copies of the original documents. This response is complete and correct to the best of my knowledge and belief.

Signed: _____

Name: _____

Title: _____

Date: _____

Subscribed and sworn to before me this ____ day of

Notary Public

My Commission expires

Kirkpatrick & Lockhart LLP

Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, PA 15222-3512
412.355.6500
www.kl.com

December 27, 2001

VIA FACSIMILE

Teff W. Smith, Esquire
Kirkland & Ellis
655 Fifteenth Street, N.W., Suite 1200

Thomas A. Donovan
412.355.8466
Fax: 412.355.6501
tdonovan@kl.com

[REDACTED]

[REDACTED]

[REDACTED] Dear Mr. Smith:

[REDACTED]

[REDACTED]

Kirkpatrick & Lockhart LLP

Tefft W. Smith, Esquire

KIRKLAND & ELLIS

PARTNERSHIPS INCLUDING PROFESSIONAL CORPORATIONS

655 Fifteenth Street, N.W.
Washington, D.C. 20005-5793

Colin R. Kass

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

KIRKLAND & ELLIS

Thomas A. Donovan, Esq.
December 27, 2001
Page 2

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

KIRKLAND & ELLIS

Thomas A. Donovan, Esq.
December 27, 2001
Page 3



Kirkpatrick & Lockhart LLP

Henry W. Oliver Building

www.kl.com

800-368-5000

Thomas A. Finnegan

C and D to MSC's Response to ANSYS's Motion For an Extension of Time to Either Respond or Move to Quash Subpoena *Duces Tecum*.

Dated: This ___ day of January, 2002

D. Michael Chappell
Administrative Law Judge