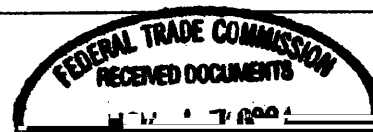




November 17, 2004



Office of the Secretary  
600 Pennsylvania Ave. N.W.  
Washington, D.C. 20580

RE: Aspen Technology Inc.'s application for approval of proposed  
divestiture of the engineering software assets (Docket No. 9310)

Dear Secretary Clark:

I am writing on behalf of Heat Transfer Research, Inc. (HTRI) to comment on the proposed  
divestiture announced in subject case. HTRI is a small for-profit company that conducts  
research, heat transfer research and develops thermal design software; this technology is

Honeywell, a very large public company with multiple entities, to utilize the acquired business