



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

September 11, 2025

Jennifer G. Tejada  
Chief Executive Officer  
PagerDuty, Inc.  
600 Townsend St., Suite 200  
San Francisco, California 94108

**Re: PagerDuty, Inc.**  
**Form 10-K for the Fiscal Year Ended January 31, 2025**  
**File No. 001-38856**

Dear Jennifer G. Tejada:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Technology