

26 August 2020

RE: Response letter dated 20 August 2020 to Derek A. Newman re: GalComm

Darryl M. Woo Esq  
Goodwin Procter LLP  
Three Embarcadero Center  
San Francisco, CA 94111

Dear Mr. Woo,

Thank you for your [letter](#) of 20 August 2020. Upon receipt of the 20 August 2020 letter, we reviewed further, and now understand that ICANN did receive a letter from you dated 6 August 2020. While it was responded to by our Global Support center, it was not escalated internally and so I was previously unaware of your [letter](#) dated 6 August 2020, which we have now also published. I apologize for this inadvertent oversight and we will use this as a training opportunity to prevent such errors in the future. As you have requested, I have corrected my 18 August 2020 [letter](#) to Mr. Newman.

However, it appears to remain true that there was no communication from Awake Security to ICANN prior to publication of its report regarding Awake Security's belief that registrar CommuniGal Communication Ltd. (GalComm) failed its obligation under the ICANN Registrar Accreditation Agreement to investigate reported abuse. Going forward, we encourage researchers such as Awake Security to expeditiously report such issues to ICANN by filing a contractual [compliance complaint](#).

Thank you for contacting us.

Sincerely,

*Russ Weinstein*

Russ Weinstein  
Vice President, GDD Accounts and Services  
Internet Corporation for Assigned Names and Numbers (ICANN)