



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

Mail Stop 4561

November 20, 2009

Michael S. Fields
Chief Executive Officer
KANA Software, Inc.
181 Constitution Drive
Menlo Park, CA 94025

**Re: KANA Software, Inc.
Preliminary Revised Proxy Statement on Schedule 14A
Filed November 20, 2009
File No. 000-27163**

Dear Mr. Fields:

We have completed our review of your filing and have no further comments at this time on the specific issues raised.

Sincerely,

Maryse Mills-Apenteng
Special Counsel

cc: Via facsimile: (415) 281-1350
David Michaels, Esq.
Fenwick & West LLP