



20 April 2018

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRY AGREEMENT

Josh Lawler
dotCOOL, Inc. (qpon)
777 S Figueroa St 37th Floor
Los Angeles, California 90017
US

Email: jlawler@zuberlaw.com
Fax: +1 213 596 5621

Dear Josh Lawler,

Please be advised that as of 20 April 2018, dotCOOL, Inc. ("dotCOOL") is in breach of its Registry Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 November 2013 ("RA"). This breach results from:

1. dotCOOL's failure to timely pay past due fees, as required by Article 6 of the RA.

Please refer to the attachment for details regarding this breach.

In addition, dotCOOL has been deemed noncompliant in the following area:

1. dotCOOL's failure to publish on its website the DNSSEC Practice Statements ("DPS") describing critical security controls and procedures for key material storage, access and usage for its own keys and secure acceptance of registrants' public-key material, as required by Section 1.3 of Specification 6 of the RA.

Additional Concerns

dotCOOL indicated during the processing of this matter that the email address on file with ICANN should not be used for communications.

ICANN requests that dotCOOL cure these breaches by 20 May 2018, 30 days from the date of this letter, by taking the following actions:

1. Publish on dotCOOL's website the DPS following the format described in RFC 6841;
2. Provide ICANN with the corrective and preventative action(s) that dotCOOL will take, with implementation date(s), to ensure:

- a. timely payment of fees to ICANN;
 - b. timely and complete response to ICANN Contractual Compliance matters; and
 - c. dotCOOL's contact information with ICANN is up to date and functioning; and
3. Pay all past and currently due fees.

If dotCOOL fails to timely cure the breaches and provide the information requested by 20 May 2018, ICANN may commence the RA termination process.

If you have questions or require assistance, please contact Jennifer Scott at jennifer.scott@icann.org.

Sincerely,



Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to pay fees

Article 6 of the RA requires registry operators to pay Registry-Level Fees on a quarterly basis within 30 calendar days following the date of the invoice provided by ICANN. dotCOOL owes ICANN past due fees, in breach of Article 6 of the RA.

Failure to publish DNSSEC Practice Statement on website

Section 1.3 of Specification 6 of the RA requires registry operators to, among other things, publish on its website the DPS describing critical security controls and procedures for key material storage, access and usage for its own keys and secure acceptance of registrants' public-key material following the format described in RFC 6841. dotCOOL's failure to publish DPS on its website is a breach of Section 1.3 of Specification 6 of the RA.

Chronology:

Date of Notice	Deadline for Response	Details
15-Dec-2017 8-Jan-2018 24-Jan-2018	N/A	ICANN sent detailed customer statements to dotCOOL, Inc. regarding past due fees.
23-Mar-2018	30-Mar-2018	ICANN sent 1st compliance notice via email to steve@dotqpon.com . No response received from Registry Operator.
4-Apr-2018	11-Apr-2018	ICANN sent 2nd compliance notice via email to steve@dotqpon.com .
6-Apr-2018	N/A	ICANN called Compliance Contact at mobile number [NUMBER REDACTED] and provided complaint details. Compliance contact requested ICANN to resend the 2nd compliance notice.
6-Apr-2018	11-Apr-2018	ICANN resent 2nd compliance notice via email to steve@dotqpon.com and castro5@me.com .
9-Apr-2018	N/A	Email received from Registry Operator (castro5@me.com) insufficient to demonstrate compliance.
9-Apr-2018	N/A	ICANN sent acknowledgement and follow up compliance notice via email to steve@dotqpon.com and castro5@me.com .
10-Apr-2018	11-Apr-2018	ICANN sent follow up compliance notice via email to steve@dotqpon.com and castro5@me.com . No response received from Registry Operator.
12-Apr-2018	19-Apr-2018	ICANN sent 3rd compliance notice via email to steve@dotqpon.com , castro5@me.com and jlawler@zuberlaw.com .

Date of Notice	Deadline for Response	Details
12-Apr-2018	N/A	ICANN sent 3rd compliance notice via fax to +1 310 388 0220. Fax successful.
16-Apr-2018	N/A	ICANN called Compliance Contact at mobile number [NUMBER REDACTED] and provided complaint details. Compliance contact requested ICANN to resend the 3rd compliance notice.
16-Apr-2018	19-Apr-2018	ICANN resent 3rd compliance notice via email to steve@dotqpon.com , castro5@me.com and jlawler@zuberlaw.com .
17-Apr-2018	N/A	Email received from Registry Operator (castro5@me.com) insufficient to demonstrate compliance.
18-Apr-2018	19-Apr-2018	ICANN sent follow up compliance notice via email to steve@dotqpon.com , castro5@me.com and jlawler@zuberlaw.com . No response received from Registry Operator.
19-Apr-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Apr-2018	N/A	To date, the Registry Operator has not made full payment or responded to ICANN with the requested information and the issue remains unresolved.