



The Internet Corporation for Assigned Names and Numbers

18 November 2016

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

James Archer
Registration Technologies, Inc. (IANA #321)
10 Crestview Dr
Greenville RI 02828
United States

Email: jarcher@registrationtek.com
Fax: +1 401 679 0404

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear James Archer,

Please be advised that as of 18 November 2016, Registration Technologies, Inc. (“Registration Technologies”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 4 October 2015 (“RAA”). This breach results from:

1. Registration Technologies’ failure to timely respond to ICANN’s Contractual Compliance Audit Program (“Audit”) notices, specifically:
 - a. Failure to provide documents and information, as required by Section 3.15 of the RAA; and
 - b. Failure to maintain and make available to ICANN registration data and records available upon request by ICANN, as required by Section 3.4.2 and 3.4.3 of the RAA.

Please refer to the attachment for details regarding these breaches.

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

Los Angeles 12025 Waterfront Drive, Suite 300 Los Angeles, CA 90094 USA T +1 310 301 5800 F +1 310 823-8649
Offices: Beijing • Brussels • Istanbul • Montevideo • Singapore • Washington

<http://icann.org>



1. Registration Technologies' failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Additional Concerns

By not providing the requested information in the Renewal/Redemption compliance matter detailed below, Registration Technologies has failed to demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy (ERRP), which mandates that beginning at the time of expiration and through the DNS resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration must be permitted by the registrar to renew the expired registration.

Additionally, Registration Technologies exhibits a pattern of non-response to domain transfer and renewal requests by registered name holders (RNHs) and ICANN compliance matters, and when responses are provided to ICANN, they are often untimely and incomplete. In addition, ICANN staff is often unable to contact Registration Technologies via telephone during business hours in the United States. Registration Technologies was previously issued notices of breach on 17 September 2014 and 16 November 2015 which raised these same areas of concern.

ICANN requests that Registration Technologies cure these breaches by 9 December 2016, 21 days from the date of this letter, by taking the following actions:

1. Complete the Audit Request for Information (RFI) Phase by:
 - a. Contacting complianceaudit@icann.org to receive your registrar's login credentials for the ICANN Compliance Site ("Site"); and
 - b. Completing the RFI and providing all supporting documentation through the Site;
2. Confirmation whether registrants of domain names sponsored by Registration Technologies are able to timely renew their domain names as requested, and if so, a detailed explanation of the functioning renewal method(s) provided to registrants by Registration Technologies, including the process and timing of your registrar's completion of the renewals;
3. If registrants of domain names sponsored by Registration Technologies are unable to timely renew their domain names as requested, provide the corrective and preventative action(s), with implementation date(s), that Registration Technologies will take to address this failure;



4. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that Registration Technologies will timely comply with RNH requests and ICANN compliance matters (beyond those provided in response to the prior notices of breach); and
5. Pay all past and currently due accreditation fees.

If Registration Technologies fails to timely cure the breaches and provide the information requested by 9 December 2016, ICANN may commence the RAA termination process.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad".

Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



ATTACHMENT

Failure to provide documents and information for audit

Section 3.15 of the RAA requires Registration Technologies, as part of any reasonable contractual compliance audit, to timely provide the documents and information known by Registration Technologies necessary to demonstrate compliance with the terms of the RAA. As detailed in the chronology below, ICANN sent Registration Technologies multiple notices regarding the requirements of ICANN's Audit Program. Registration Technologies' failure to respond and provide the requested documents and information in response to the audit is a breach of Section 3.15 of the RAA.

Failure to retain registered name holder and registration data and failure to make such data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA requires registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Registration Technologies' failure to provide the requested registration records and data related to the audit notice detailed in the chronology below is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Registration Technologies owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA. Registration Technologies additionally owes currently due accreditation fees, due 30 November 2016.

Chronology (Audit):

Date of Notice	Deadline for Response	Details
3-Oct-2016	25-Oct-2016	ICANN sent 1st compliance notice via email to jarcher@registrationtek.com . No response received from Registrar.
26-Oct-2016	1-Nov-2016	ICANN sent 2nd compliance notice via email to jarcher@registrationtek.com . No response received from Registrar.

Date of Notice	Deadline for Response	Details
27-Oct-2016	N/A	ICANN called Primary Contact at +1 401 949 1279 and at mobile number [NUMBER REDACTED]. ICANN left voicemails with complaint details.
2-Nov-2016	8-Nov-2016	ICANN sent 3rd compliance notice via email jarcher@registrationtek.com . No response received from Registrar.
3-Nov-2016	N/A	ICANN sent 3rd compliance notice via fax to +1 401 679 0404. Fax successful.
4-Nov-2016	N/A	ICANN called Primary Contact at +1 401 949 1279 and at mobile number at [NUMBER REDACTED]. ICANN left voicemails with complaint details.
17-Nov-2016	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
18-Nov-2016	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (TNR-578-44384 Renewal/Redemption):

Date of Notice	Deadline for Response	Details
4-Oct-2016	11-Oct-2016	ICANN sent 1st compliance notice via email to jarcher@registrationtek.com . No response received from Registrar.
18-Oct-2016	25-Oct-2016	ICANN sent 2nd compliance notice via email to jarcher@registrationtek.com . No response received from Registrar.
18-Oct-2016	N/A	ICANN called Primary Contact at +1 401 949 1279 and provided Primary Contact with complaint details.
26-Oct-2016	2-Nov-2016	ICANN sent 3rd compliance notice via email to jarcher@registrationtek.com .
26-Oct-2016	N/A	ICANN sent 3rd compliance notice via fax to +1 401 679 0404. Fax successful.
28-Oct-2016	N/A	ICANN called Primary Contact at +1 401 949 1279 and at mobile number [NUMBER REDACTED]. ICANN left voicemails with complaint details.



Date of Notice	Deadline for Response	Details
3-Nov-2016	N/A	Email from Registrar (bostcolojim@gmail.com) insufficient to demonstrate compliance.
3-Nov-2016	N/A	ICANN called Primary Contact at +1 401 949 1279. ICANN left voicemail with complaint details. ICANN called Primary Contact at mobile number [NUMBER REDACTED] and provided Primary Contact with complaint details.
4-Nov-2016	11-Nov-2016	ICANN sent follow-up compliance notice via email to jarcher@registrationtek.com and bostcolojim@gmail.com . No response received from Registrar.
17-Nov-2016	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
18-Nov-2016	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.