



**TRANSMITTED VIA FACSIMILE, POSTAL MAIL AND ELECTRONIC MAIL**

15 May 2008

Mr. Daniel Sundin  
Red Register, Inc.  
8025 Excelsior Drive Suite 200  
Madison, WI 53717  
United States  
Attn: Daniel Sundin

**Re: Notice of Breach of ICANN Registrar Accreditation Agreement**

Dear Mr. Sundin:

Please be advised that as of 10 May 2008, Red Register, Inc. is in breach of the Internet Corporation for Assigned Names and Numbers (“ICANN”) Registrar Accreditation Agreement (“RAA”) for failure to comply with the Uniform Domain-Name Dispute-Resolution Policy (“UDRP”). Despite repeated requests from ICANN and the National Arbitration Forum (“NAF”), Red Register, Inc. failed to comply with UDRP Rule 16(a) and paragraph 4(k) of the UDRP.

**UDRP Rule 16(a)**

Rule 16(a) requires concerned Registrars, “immediately communicate to each Party, the Provider, and ICANN the date for the implementation of the decision in accordance with the Policy.”

NAF rendered a decision on 18 February 2008 ordering Red Register, Inc. to transfer the domain name <cambridgepavingstone.com> to Complainant, Cambridge Pavers, Inc. NAF routinely communicates Panel Decisions to registrars involved in disputes pursuant to Rule 16(a). ICANN also forwarded Red Register, Inc. a copy of the decision. In addition, on the following dates, ICANN requested that Red Register, Inc. implement the decision: 15 April 2008, 16 April 2008 and 18 April 2008. As of the date of this letter, Red Register, Inc. has not communicated its intention to implement the decision on a specific date to the complainant, NAF or ICANN. Accordingly, Red Register, Inc. is in violation of the RAA due to its failure to comply with its communication obligations pursuant to UDRP Rule 16(a).



Paragraph 4(k) of the UDRP

Paragraph 4(k) of the UDRP requires registrars to implement a UDRP decision unless it receives official documentation (such as a copy of a complaint, file-stamped by the clerk of the court) within ten business days, after the Provider rendered the decision, that the respondent has commenced a lawsuit against the complainant. The respondent must have commenced the lawsuit in a jurisdiction to which the complainant has submitted under UDRP provision 3(b)(xiii) of the Rules of Procedure.

Absent documentation that Versata Software commenced a lawsuit against Cambridge Pavers, Inc., pursuant to the UDRP rules of Procedure, Red Register, Inc. had an obligation to implement the decision within ten days of 18 February 2008. As of the date of this letter, Red Register has not implemented the decision. Therefore, Red Register, Inc. is in violation of the RAA

Section 5.3.4 of the RAA provides that the RAA may be terminated before its expiration by ICANN if a registrar fails to cure any breach of this Agreement within fifteen working days after ICANN gives the registrar notice of the breach. Please note, if Red Register, Inc. fails to cure the breach cited herein by implementing the NAF decision by 6 June 2008, ICANN may terminate the Red Register, Inc. RAA.

ICANN specifically reserves the right to pursue any and all other breaches besides those enumerated above, and nothing herein shall be deemed a waiver of that right.

Please contact me at (310) 301-3860 should you have any questions regarding the contents of this letter.

Very truly yours,

A handwritten signature in blue ink that reads "Stacy Burnette". The signature is fluid and cursive, with the first name and last name clearly legible.

Stacy Burnette  
Director  
Contractual Compliance