

27 May, 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Ms. Maguy Serad
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Jamie Hedlund, VP, Contractual Compliance, ICANN
Akram Atallah, President, Global Domains Division, ICANN
Xavier J. Calvez, SVP, CFO, ICANN
John O. Jeffrey, General Counsel & Secretary, ICANN
Asha Hemrajani, Chair of Finance Committee, ICANN Board of Directors

Dear Ms. Serad,

RE: .信息(xn--vuq861b) Registry's Response to Notice of Breach of Registry Agreement

I write on behalf of the .信息(xn--vuq861b) Registry Operator ("Registry") in response to the notice of breach of registry agreement issued by ICANN to the Registry dated on 3 May 2017 ("Breach Notice").

Our Registry has serious concerns about the way in which this Breach Notice was issued and respectfully requests that our response letter be published at the correspondence page on ICANN website <https://www.icann.org/resources/pages/correspondence> for public record.

In our view, the alleged breach regarding overdue fees was caused by an ICANN internal operational issue. Specifically, our Registry updated our billing contact in the GDD portal in late 2015. However, it appears that ICANN Finance department was still sending invoices to the old (out of date) billing contact. As a result, some invoices went astray and became overdue. In addition, we note ICANN Compliance included an invoice that was yet due (on 30 May 2017) in the Breach Notice.

We are also concerned about the way in which that other alleged non-compliance areas (such as certain information on our Registry website) have never been brought to our attention in accordance with ICANN Compliance published 1-2-3 approach and process:

<https://www.icann.org/en/system/files/files/overall-03oct14-en.pdf>

Based on the above, we do not believe it was appropriate for ICANN to issue the Breach Notice in the first place. We request that ICANN either withdraw the Breach Notice or issue a revised notice.

Notwithstanding our concerns above, the issues identified in the Breach Notice have been addressed:

1. We have made payments for the overdue fees, namely the registry fee for Q1 2016 and TMCH fee for Q1 2016 in the total amount of \$5027.5 on 17 May, 2017, and the registry fee for Q2 2017 in the amount of \$6395.50 on 25 May, 2017.
2. Regarding the Whois output issue, the updated Whois query output can be found at <http://whois.teleinfo.cn>.
3. With regard to the web-posting requirements, the new pages can be found at:

Whois educational material page:

http://www.teleinfo.cn/en/page/policies/20170509_2.html

Abuse contact information page:

<http://www.teleinfo.cn/en/contact-us.html>

DNSSEC Practice Statement:

<http://www.teleinfo.cn/en/page/policies/dnssec.pdf>

4. Regarding some mobile phones being unreachable, relevant Registry's Points of Contact have been updated in the GDD portal on 23 May 2017.

In relation to over-due fees, as explained above and to avoid similar problems from reoccurring in the future, we request that ICANN confirms the following:

- a. ICANN has systems and process in place to ensure each department has access to and uses the most up-to-date registry contacts in the GDD portal for billing purposes and sending follow-up communications and legal notices.
- b. ICANN Compliance will conduct due diligence (with proper coordination with other departments) and follow its own published due process before issuing a breach notice. Further, instead of a statement, copies of overdue invoices will be attached to a breach notice. Otherwise, as in this case, we had to go back and forth with ICANN Finance several times to ask for the actual invoices in order to process the payments.

If you have any further questions, please contact Yaling Tan at tyl@teleinfo.cn.

Sincerely,

Lv Hongze 吕洪泽
Head of Domain Name Business
Beijing Teleinfo Network Technology Co., Ltd.