



The Internet Corporation for Assigned Names and Numbers

TRANSMITTED VIA FACSIMILE, ELECTRONIC MAIL AND COURIER

16 February 2012

Mr. Serdar Acir
Alantron Bilişim Ltd Şti. (IANA ID 898)
KOU Teknopark YeniKoy Yerleskesi D2
Izmit Kocaeli 41200
Turkey

**RE: NOTICE OF SUSPENSION OF REGISTRAR'S ABILITY
TO CREATE NEW REGISTERED NAMES OR
INITIATE INBOUND TRANSFERS OF REGISTERED NAMES**

Dear Mr. Acir:

Be advised that Alantron Bilişim Ltd Şti.'s ("Alantron") ability to create new Registered Names or initiate inbound transfers of Registered Names is suspended pursuant to Section 2.1 of the Registrar Accreditation Agreement between Alantron and the Internet Corporation for Assigned Names and Numbers, dated 22 March 2010 ("RAA").

The suspension is effective 17:00:00 (UTC/GMT) 8 March 2012 through 17:00:00 (UTC/GMT) 6 April 2012, or longer if Alantron has not cured all outstanding breaches and demonstrated compliance on or before 28 March 2012. Consistent with Section 2.1 of the RAA, during the suspension period, Alantron must not:

1. Create new Registered Names for any TLD; or
2. Initiate or accept inbound transfers of Registered Names for any TLD.

This suspension is due to Alantron's failure to timely cure the breaches set forth in ICANN's Notice of Breach of RAA dated 7 November 2011 ("Notice of Breach") <http://www.icann.org/en/correspondence/burnette-to-acir-07nov11-en.pdf>. As of the date of this letter, Alantron's outstanding breaches include:

- a) Failure to maintain registration records pursuant to Section 3.4 of the RAA;
- b) Failure to make registration records available for inspection and copying upon reasonable notice by ICANN pursuant to Section 3.4 of the RAA; and
- c) Failure to timely pay accreditation fees pursuant to Section 3.9 of the RAA.

Brussels	6 Rond Point Schuman, Bl. 5	B-1040 Brussels	BELGIUM	T +32 2 234 7870	F +32 2 234 7848
Sydney	Level 2, 48 Hunter Street	Sydney NSW 2000	AUSTRALIA	T +61 2 8236 7900	F +61 2 8236 7913
Washington, DC	1875 I Street, NW, 5th Floor	Washington, DC 20006	USA	T +1 202 429 2704	F +1 202 429 2714
Marina del Rey	4676 Admiralty Way, Suite 330	Marina del Rey, CA 90292	USA	T +1 310 823 9358	F +1 310 823 8649



Please see the attached chronology for details. We also took into account Alantron's compliance record in the past two years, as this is Alantron's second breach in the past two years (16 April 2010) and there have been numerous non-compliance incidents, including repeated failures to deposit escrow data.

Alantron must immediately cure all outstanding breaches to remain an ICANN-accredited registrar. Alantron must demonstrate compliance ten days before the scheduled suspension period ends. Accordingly, Alantron must cure all outstanding RAA breaches on or before 28 March 2012. Failure to cure all outstanding breaches by 28 March 2012 will result in RAA termination and an extension of Alantron's suspension pending final termination.

To cure the outstanding breaches and demonstrate compliance with the RAA, ICANN demands that Alantron:

1. Implement a system to retain all required registration records and related correspondence with Registered Name Holders, as required by Section 3.4 of the RAA;
2. Provide proof of implementation on or before 28 March 2012; and
3. Pay all past due accreditation fees in the amount of \$4,335.31 by 28 March 2012.

Additional Concerns

On 22 November 2011, in response to ICANN's request that Alantron cure the breaches set forth in ICANN's Notice of Breach, Alantron admitted that:

1. Its electronic domain name registration systems were deficient, resulting in two parties being notified that they had successfully registered the same domain name;
2. Its Whois server provided unreliable data reflecting Alantron's failure to update Whois records daily as required by Section 3.3.1 of the RAA; and
3. Its electronic domain name registration systems were not communicating with each other.

ICANN is requesting that Alantron provide specific data to allow ICANN to monitor Alantron's compliance with the RAA. Beginning 1 March 2012, and until further notice, please provide the following:

- A comprehensive list of all Registered Names under Alantron's management (this should be provided on the 1st day of every month); and



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- Weekly summaries, to be provided every Tuesday, of domain name database changes (examples include, deletions, transfers out, changes in contact information, name server changes and renewals). The summary must include the name of every domain for which a change has been made and a description of the change. This information should be provided in a CSV file. See the attached document for additional information regarding the format ICANN is requesting Alantron use to provide this information.

Notice on Alantron's Web Site

During the suspension period, Alantron must prominently display the following on its web site on all pages where Registrar Services, as defined by the RAA, are offered:

No new registrations or inbound transfers will be accepted from 8 March 2012 through 6 April 2012.

If you have any questions, please contact me at stacy.burnette@icann.org.

Sincerely,

A handwritten signature in blue ink that reads "Stacy Burnette".

Stacy Burnette
Director
Contractual Compliance

cc VeriSign (.com, .net, .name)
 Neustar (.biz)
 PIR (.org)
 Afilias (.info)

Chronology

Below is a chronology of our correspondence and other attempts to obtain records from Alantron demonstrating compliance with the RAA.

7 Nov. 2011	<p>After several informal attempts to resolve non-compliance issues, ICANN sent a Notice of Breach to Alantron's primary contact, Serdar Acir, via email at serdaracir@alantron.com, facsimile and postal mail. The Notice of Breach was based on Alantron's failure to maintain and provide access to registration data. The Notice of Breach required Alantron to provide data demonstrating compliance by 28 November 2011.</p>
10 Nov. 2011	<p>Mr. Acir contacted ICANN, via email, and provided a "first draft" of Alantron's response to ICANN's Notice of Breach that included records purporting to demonstrate compliance with the RAA. Mr. Acir stated a "full" response would be provided soon.</p>
11 Nov. 2011	<p>ICANN responded to Mr. Acir's 10 November 2011 email message reminding Mr. Acir that Alantron must cure all breaches by 28 November 2011. ICANN advised Alantron that to cure the breaches and demonstrate compliance with Section 3.4 of the RAA, Alantron needed to provide the following documents and data concerning a specific domain name by 28 November 2011:</p> <ul style="list-style-type: none"> • The submission date and time, and the content, of all registration data (including updates and deletions) Alantron submitted to the .COM registry operator, VeriSign Inc.; • Copies of Whois outputs and reasons for changes; • Copies of all registration agreements; • Copies of all written communications constituting registration applications, confirmations, modifications, or terminations and related correspondence with Registered Name Holders; and • Copies of all records of the accounts of all Registered Name Holders with Registrar, including dates and amounts of all payments and refunds. <p>ICANN further advised Mr. Acir that it was in Alantron's best interest to provide complete information that clearly demonstrated compliance. The provision of partial, ambiguous information that did not demonstrate compliance may result in the loss of Alantron's accreditation.</p>



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15 Nov. 2011	Mr. Acir contacted ICANN, via email, stating that Alantron did not have all of the data requested in the Notice of Breach and that some of the data was in the possession of Snapnames.com. Mr. Acir further stated that ICANN was the only party that could request the data from Snapnames.com.
16 Nov. 2011	ICANN responded to Mr. Acir, via email and telephone, stating that ICANN would not request registration data from any entity other than Alantron, as Alantron is required to maintain all registration data concerning domain names managed by Alantron.
22 Nov. 2011	Mr. Acir contacted ICANN, via email, and provided a response to ICANN's Notice of Breach. Mr. Acir provided narratives and seemingly incomplete registration data. The data did not include evidence that registration contracts were consummated. However, the information included admissions that Alantron maintained two electronic registration systems that did not communicate, which resulted in two different parties being notified that they had successfully registered the same domain name. Additionally, the information stated that Alantron failed to timely update its Whois records.
29 Nov. 2011	ICANN contacted Mr. Acir, via email, requesting that he advise ICANN staff if specific data demonstrating that registration contracts were consummated was provided in the data sent to ICANN on 22 November 2011, as that information was not found.
30 Nov. 2011	Mr. Acir contacted ICANN, via email, advising that all of the data ICANN requested was provided on 22 November 2011.
7 Dec. 2011	ICANN contacted Mr. Acir, via telephone , to inform Mr. Acir that the information provided by Alantron to date did not demonstrate that Alantron was maintaining all required registration records, as the information provided only included copies of the registrar's registration contract, but no evidence demonstrating that specific registrants agreed to the terms of Alantron's registration contract. In that conversation, Mr. Acir admitted that Alantron had not provided the specific information requested by ICANN concerning registration contracts. ICANN sent an email message to Mr. Acir memorializing the telephone conversation and requesting that Alantron provide time stamped electronic logs reflecting the IP address of each registrant (or the registrant's agent) that registered a specific domain name and agreed to Alantron's registration contract to prove that Alantron is maintaining registration data as required by Section 3.4.2 of the RAA. Alantron was requested to

	provide this information within 24 hours.
8 Dec. 2011	Mr. Acir contacted ICANN, via email, requesting an additional 24 hours to respond to ICANN's request due to the size of the log files that needed to be reviewed.
9 Dec. 2011	Mr. Acir contacted ICANN, via email, and provided data in response to ICANN's 7 December 2011 request. The data provided did not demonstrate compliance with Section 3.4 of the RAA, as it did not demonstrate that Alantron maintained records regarding Registered Names Holders' registration contracts.
16 Dec. 2011	Mr. Acir contacted ICANN, via telephone, to discuss the data provided on 9 December 2011. ICANN advised Mr. Acir that the data he provided did not demonstrate compliance. Mr. Acir stated that perhaps there was a language problem because English was not his first language. The parties discussed having a telephone conference with an interpreter to assist with communication on 20 December 2011.
19 Dec. 2011	ICANN contacted Mr. Acir, via email, to advise that the meeting scheduled for 20 December 2011 was cancelled; however, ICANN would have a previous email message that set forth exactly what was needed to demonstrate compliance translated to Turkish and that notice would be provided to Mr. Acir as soon as possible.
23 Dec. 2011	ICANN staff with fluency in Turkish contacted Mr. Acir to communicate ICANN's data request in Turkish. Mr. Acir provided documents in response to this request; however, the documents did not demonstrate compliance with Section 3.4 of the RAA.
27 Dec. 2011	<p>ICANN sent Mr. Acir a compliance notice, via email, stating, among other things, that the documents provided on 23 December 2011 did not demonstrate compliance with Section 3.4 of the RAA. ICANN requested (in English and Turkish) that Alantron provide the following documents and data concerning a specific domain name to demonstrate compliance with Section 3.4 of the RAA:</p> <ul style="list-style-type: none"> • The submission date and time, and the content, of all registration data (including updates and deletions) Alantron submitted to the .COM registry operator, VeriSign Inc.; • Copies of Whois outputs and reasons for changes; • Copies of all registration agreements; • Copies of all written communications constituting registration applications, confirmations, modifications, or terminations and related correspondence with Registered Name Holders; and

	<ul style="list-style-type: none"> Copies of all records of the accounts of all Registered Name Holders with Registrar, including dates and amounts of all payments and refunds. A sample of the type of data that was requested was attached to the email message.
1 Jan. 2012	Mr. Acir sent ICANN a note, via email, stating that Alantron had given ICANN all of the documents it had concerning this issue.
4 Jan. 2012	Mr. Acir sent ICANN additional data, via email. This data included an admission that Alantron did not have records reflecting the dates and amounts of all payments and refunds concerning Registered Names Holders that registered domain names with Alantron through the batch pool process.
4 Jan. 2012	ICANN contacted Mr. Acir, via email, to get clarification regarding the data submitted on 4 January 2012, as it referenced records that were not included in the information provided.
4 Jan. 2012	Mr. Acir contacted ICANN, via telephone, to advise that there were no additional records and he was not sure why records were referenced that did not exist.
11 Jan. 2012	ICANN contacted Mr. Acir, via email and telephone, to inquire about non-working links contained in the data submitted on 4 January.
12 Jan. 2012	Mr. Acir sent ICANN a note, via email, stating that he needed time to go through Alantron's records to respond to ICANN's inquiry.
16 Jan. 2012	Mr. Acir contacted ICANN, via email, regarding ICANN's question about non-working links in the data provided on 4 January 2012. Mr. Acir advised that the relevant information that might be accessed through the non-working links in the document, was provided in text in another section of the document. Mr. Acir offered to provide any additional information needed.