



The Internet Corporation for Assigned Names and Numbers

24 July 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Richard Araujo  
Telefonica Brasil S.A. (IANA #1458)  
Alameda Chucri Zaidan, 860 2nd andar lado A  
Sao Paulo SP 01404---001  
Brazil

Email: [richard.araujo@telefonica.com](mailto:richard.araujo@telefonica.com)  
Fax: +55 11 99802 6894

**RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT**

Dear Richard Araujo,

Please be advised that as of 24 July 2014, Telefonica Brasil S.A. (“Telefonica”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 29 May 2014 (“RAA”). This breach results from:

1. Telefonica’s failure to maintain and provide to ICANN accurate and current information as specified in Section 3.17 of the RAA and the Registrar Information Specification (“RIS”); and
2. Telefonica’s failure to pay past due accreditation fees pursuant to Section 3.9 of the RAA.

Please refer to the attachment for details regarding this breach.

ICANN requests that Telefonica cure the breaches by 14 August 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide ICANN with current and accurate data concerning the registrar information spreadsheet sent to Telefonica on the dates listed in the chronology below, and any accompanying documentation required by the RIS; and
2. Pay all past due accreditation fees of \$2,725.20.



Richard Araujo  
Telefonica Brasil S.A.

Page 2 of 4

If Telefonica fails to timely cure the breaches and provide the information requested by 14 August 2014, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at [owen.smigelski@icann.org](mailto:owen.smigelski@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 maintain and provide accurate and current information

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN accurate and current information as specified in the RIS of the RAA. Telefonica's failure to provide the requested registrar information is a breach of Section 3.17 of the RAA and the RIS.

### 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. Telefonica's failure to pay ICANN \$2,725.20 in past due accreditation fees is a breach of Section 3.9 of the RAA.

### Chronology:

Date of Notice	Deadline for Response	Details
18---Jun---2014	25---Jun---2014	ICANN sent 1st compliance notice and RIS spreadsheet via email to <a href="mailto:richard.araujo@telefonica.com">richard.araujo@telefonica.com</a> . No response received from Registrar.
26---Jun---2014	3---Jul---2014	ICANN sent 2nd compliance notice and RIS spreadsheet via email to <a href="mailto:richard.araujo@telefonica.com">richard.araujo@telefonica.com</a> . No response received from Registrar.
1---Jul---2014	N/A	ICANN called Primary Contact at +55 11 981411492. Primary Contact asked ICANN to resend the 2nd compliance notice to <a href="mailto:richard.araujo@telefonica.com">richard.araujo@telefonica.com</a> . ICANN advised Primary Contact to reply to the ticket if he has any questions.
1---Jul---2014	3---Jul---2014	ICANN resent 2nd compliance notice and RIS spreadsheet via email to <a href="mailto:richard.araujo@telefonica.com">richard.araujo@telefonica.com</a> at Registrar's request.
1---Jul---2014	N/A	Email from Registrar indicating that it would read the notice and respond. Requested information not provided.
9---Jul---2014	16---Jul---2014	ICANN sent 3rd compliance notice and RIS spreadsheet via email to <a href="mailto:richard.araujo@telefonica.com">richard.araujo@telefonica.com</a> .



Date of Notice	Deadline for Response	Details
9---Jul---2014	N/A	ICANN faxed 3rd compliance notice and RIS spreadsheet to +55 11 99802 6894. Fax unsuccessful.
11---Jul---2014	N/A	ICANN called Primary Contact at (REDACTED) and left a message with notice details and provided direct line for questions. ICANN called Primary Contact at +55 11 96902 8092. Answered by an automated message in Portuguese, "the call could not be completed at that moment."
11---Jul---2014	N/A	Email from Registrar acknowledging receipt of notice. Requested documentation not provided.
17---Jul---2014	N/A	ICANN conducted compliance check for other areas of noncompliance.
24---Jul---2014	N/A	To date, Registrar has not provided the requested documentation and information.