



The Internet Corporation for Assigned Names and Numbers

16 November 2015

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 Mr. Archer,

Please be advised that as of 16 November 2015, 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”). These breaches result from:

1. Registration Technologies’ failure to maintain and make available to ICANN registration data and records relating to dealings with the Registered Name Holders (“RNHs”) of the domain names <leicester.info> and <customcomm.net>, as required by Sections 3.4.2 and 3.4.3 of the RAA; and
2. Registration Technologies’ failure to allow the RNH of the domain name <customcomm.net> to transfer its domain registration to another registrar pursuant to Section 1 of the Inter-Registrar Transfer Policy (“IRTP”), or, alternatively, provide a valid reason for denial pursuant to Section 3 of the IRTP.

Please refer to the attachment for details regarding these breaches.

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

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

<http://icann.org>



1. Registration Technologies' failure to provide domain name data in the specified response format, as required by Section 1.4 of the Registration Data Directory Service (Whois) Specification of the RAA ("Whois Specification");
2. Registration Technologies' failure to publish an email address to receive abuse reports on the home page of Registration Technologies' website, as required by Section 3.18.1 of the RAA;
3. Registration Technologies' failure to publish on its website a description of Registration Technologies' procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;
4. Registration Technologies' failure to publish the full name and position of all officers of the registrar on Registration Technologies' website, as required by Section 3.17 of the RAA and Section 17 of the Registrar Information Specification ("RIS") of the RAA; and
5. Registration Technologies' failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Additional Concerns

Registration Technologies was previously issued a notice of breach on 17 September 2014 for similar violations of the IRTTP and non-responsiveness to transfer requests from RNHs and ICANN compliance notices.

ICANN requests that Registration Technologies cure these breaches by 7 December 2015, 21 days from the date of this letter, by taking the following actions:

1. Provide the AuthInfo code to the RNH and allow the transfer of the domain name <customcomm.net> to another registrar, or provide a valid reason for denial;
2. Provide evidence that the email address used to send the renewal notices for the domain name <leicester.info> corresponded to the RNH at the time the notices were sent;
3. Provide copies of all written communications, including time-stamped communications, between Registration Technologies and the RNH of the domain name <customcomm.net>;



4. Provide ICANN with corrective and preventative action(s), including implementation dates and milestones, to ensure that Registration Technologies will timely comply with the IRTP, including requests for transfer from RNHs, beyond those provided in response to Registration Technologies' 17 September 2014 notice of breach;
5. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification;
6. Publish an email address to receive abuse reports on the home page of Registration Technologies' website;
7. Publish a description of Registration Technologies' procedures for the receipt, handling and tracking of abuse reports on Registration Technologies' website;
8. Publish on Registration Technologies' website the full name and position of all officers of Registration Technologies; and
9. Pay all past due accreditation fees.

If Registration Technologies fails to timely cure the breaches and provide the information requested by 7 December 2015, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at owen.smigelski@icann.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad", is written over a light blue circular watermark.

Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



ATTACHMENT

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 domain names <leicester.info> and <customcomm.net> is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to allow RNH to transfer its domain name registration to another registrar or, alternatively, provide a valid reason for denying the transfer

Section 1 of the IRTP states that RNHs must be able to transfer their domain name registrations between registrars. Registrars may only deny a transfer request for the specific instances listed in Section 3 IRTP. Registration Technologies' failure to allow the transfer of the domain name <customcomm.net> or provide a valid reason for denial of transfer is a breach of Section 1 of the IRTP.

Failure to display required Whois format

Section 1.4 of the Whois Specification of the RAA requires registrars to display domain name data in a specified format for Whois query responses. The format of responses shall contain all the elements and follow a semi-free text format outlined in Section 1.4 of the Whois Specification. Registration Technologies' failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA.

Failure to publish an email address to receive reports of abuse

Section 3.18.1 of the RAA requires registrars to publish on the home page of their website an email address to receive abuse reports. Registration Technologies' failure to publish an email address on the home page of its website to receive abuse reports is a breach of Section 3.18.1 of the RAA.

Failure to publish a description of procedures for receipt, handling and tracking of abuse reports

Section 3.18.3 of the RAA requires registrars to publish on their website a description of their procedures for the receipt, handling and tracking of abuse reports. Registration Technologies' failure to publish a description of its procedures for the receipt, handling and tracking of abuse reports on its website is a breach of Section 3.18.3 of the RAA.

Failure to publish the full name and position of all officers on registrar’s website

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. In addition, registrars must publish on each website through which it provides or offers registrar services, the information specified in the RIS as requiring publication. Registration Technologies’ failure to publish the full name and position of all of its officers on its website is a breach of Section 3.17 of the RAA and Section 17 of 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. 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 29 November 2015.

Chronology:

ENE-154-07270 (Domain Renewal/Redemption)

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 15-Oct-2015 | 22-Oct-2015 | ICANN sent 1st compliance notice via email to jarcher@registrationtek.com . No response received from Registrar. |
| 26-Oct-2015 | 2-Nov-2015 | ICANN sent 2nd compliance notice via email to jarcher@registrationtek.com . No response received from Registrar. |
| 29-Oct-2015 | N/A | ICANN called Primary Contact at +1 401 949 1279. ICANN left a detailed message with complaint details. |
| 4-Nov-2015 | 11-Nov-2015 | ICANN sent 3rd compliance notice via email to jarcher@registrationtek.com . |
| 5-Nov-2015 | N/A | ICANN sent 3rd compliance notice via fax to +1 401 679 0404. Fax successful. |
| 9-Nov-2015 | N/A | ICANN called Primary Contact at +1 401 949 1279 and at mobile at [MOBILE REDACTED]. ICANN left detailed messages with complaint details. |

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 12-Nov-2015 | N/A | Email from Registrar (jarcher@registrationtek.com). Reply insufficient to demonstrate compliance. |
| 12-Nov-2015 | 13-Nov-2015 | ICANN sent follow up compliance notice via email to jarcher@registrationtek.com . No response received from Registrar. |
| 13-Nov-2015 | N/A | ICANN conducted compliance check to determine other areas of noncompliance. |
| 16-Nov-2015 | N/A | To date, the Registrar has not responded to ICANN with the requested information and documentation. |

HVM-522-47508 (Transfer)

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 20-Oct-2015 | 27-Oct-2015 | ICANN sent 1st compliance notice via email to jarcher@registrationtek.com and support@registrationtek.com . |
| 21-Oct-2015 | N/A | Auto-response email from Registrar (support@registrationtek.com). Reply insufficient to demonstrate compliance. |
| 28-Oct-2015 | 4-Nov-2015 | ICANN sent 2nd compliance notice via email to jarcher@registrationtek.com and support@registrationtek.com . |
| 28-Oct-2015 | N/A | Auto-response email from Registrar (support@registrationtek.com). Reply insufficient to demonstrate compliance. |
| 29-Oct-2015 | N/A | ICANN called Primary Contact at +1 401 949 1279. ICANN left a detailed message with complaint details. |
| 6-Nov-2015 | 13-Nov-2015 | ICANN sent 3rd compliance notice via email to jarcher@registrationtek.com and support@registrationtek.com . |
| 6-Nov-2015 | N/A | ICANN sent 3rd compliance notice via fax to +1 401 679 0404. Fax successful. |
| 6-Nov-2015 | N/A | Auto-response email from Registrar (support@registrationtek.com). Reply insufficient to demonstrate compliance. |



| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|--|
| 9-Nov-2015 | N/A | ICANN called Primary Contact at +1 401 949 1279 and at mobile at [MOBILE REDACTED]. ICANN left detailed messages with complaint details. |
| 13-Nov-2015 | N/A | ICANN conducted compliance check to determine other areas of noncompliance. |
| 15-Nov-2015 | N/A | Email from Registrar (jarcher@registrationtek.com). Reply insufficient to demonstrate compliance. |
| 16-Nov-2015 | N/A | To date, Registrar has not responded to ICANN with the requested information and documentation and the transfer has not been completed. |