



The Internet Corporation for Assigned Names and Numbers

7 March 2013

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Li Guanghao
Beijing Tong Guan Xin Tian Technology Ltd (Novaltel) (IANA ID# 1608)
Room 2606-2607, Unit 1, Jin Quan Time Square, No. 317 Da Tun Li Chaoyang District
Beijing 100101
China

Email: service@noval.tel
Fax: +86 10 8487 4199 x 802

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Li Guanghao,

Please be advised that as of 7 March 2014, Beijing Tong Guan Xin Tian Technology Ltd (Novaltel) (“Novaltel”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 21 November 2011 (“RAA”). These breaches result from:

- Novaltel’s failure to pay past due accreditation fees pursuant to Section 3.9 of the RAA.

Please refer to the attachment for details regarding these breaches. In addition, Novaltel has been deemed noncompliant in the following areas:

- Failure to make weekly data escrow deposits, as required by Section 3.6 of the RAA.
- Failure to provide an interactive web page and a port 43 Whois service for all active Registered Names sponsored by Novaltel, as required by Section 3.3.1 of the RAA.



ICANN requests that Novaltel cure the breaches by 28 March 2014, 15 working days from the date of this letter, by taking the following actions:

1. Pay all past due accreditation fees of \$6,042.41;
2. Deposit gTLD registration data on a weekly basis to Iron Mountain Intellectual Property Management, Inc. ("Iron Mountain") and ensure the deposits meet the required specifications; and
3. Provide an interactive web page and a port 43 Whois service providing free public query-based access to up-to-date data concerning all active Registered Names sponsored by Novaltel for each Top Level Domain in which it is accredited.

If Novaltel fails to timely cure the breaches by 28 March 2014, 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 Pay Accreditation Fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Novaltel owes ICANN \$6,042.41 in past due accreditation fees, in breach of Section 3.9 of the RAA.

Failure to Escrow gTLD Registration Data

Section 3.6 of the RAA requires registrars to submit electronic copy of the database described in Subsection 3.4.1 of the RAA to ICANN, or at registrar's expense, to a reputable escrow agent mutually approved by the registrar and ICANN. Registrars shall submit the data on a schedule, under the terms, and in a format specified by ICANN.

ICANN's records show that Novaltel is required to escrow data with Iron Mountain on a weekly basis. However, based on the reports provided by Iron Mountain, since 7 February 2014 Novaltel failed to make data deposits, in breach of Section 3.6 of the RAA.

Failure to Provide Whois Service

Section 3.3.1 of the RAA requires registrars to provide an interactive web page and a port 43 Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by the registrar.

Novaltel is not providing Whois data via port 43 for all domain names sampled by ICANN. Furthermore, Novaltel's websites (novaltel.com and novaltel.net) are not accessible, so Novaltel is not providing web-based Whois service in breach of Section 3.3.1.

Chronology:

Date of Notice	Deadline for Response	Details
30-Aug-2013 27-Sep-2013 21-Nov-2013	Within 30 days	ICANN sent detailed customer statements to Registrar regarding past due accreditation fees.
23-Dec-2013	6-Jan-2014	ICANN sent 1st compliance notice via email to li@novaltel.net . No response received from Registrar.

Date of Notice	Deadline for Response	Details
9-Jan-2014	16-Jan-2014	ICANN sent 2nd compliance notice via email to li@novaltel.net and service@noval.tel .
13-Jan-2014	N/A	Email from Registrar indicating ICANN's accounting department was contacted to discuss past due accreditation fees and to expect a wire transfer within the week.
13-Jan-2014	N/A	ICANN called Primary Contact's mobile at (REDACTED). (no answer). ICANN called Primary Contact's number listed in RADAR (+86 10 8487 4199) but was the wrong number.
14-Jan-2014	16-Jan-2014	ICANN sent follow-up notice via email to li@novaltel.net and service@noval.tel regarding payment of past due accreditation fees.
3-Feb-2014	14-Feb-2014	ICANN sent 3rd compliance notice via email to li@novaltel.net and service@noval.tel .
3-Feb-2014	N/A	The 3rd notice was faxed to +86 10 8487 4199 x 802 (unsuccessful) and to Registrar's billing department at +86 10 8571 2528 (successful).
11-Feb-2014	N/A	ICANN called Primary Contact's number in RADAR (+86 10 8487 4199) and left message. ICANN called Primary Contact's mobile at (REDACTED). Line was busy and no option to leave a message.
14-Feb-2014	N/A	Email from Registrar requesting a payment extension until 28 February 2014. Registrar advised ICANN of voluntary termination no extension available. Email from ICANN to li@novaltel.net with additional payment options. Email from Registrar requesting a payment extension until 28 February 2014.
18-Feb-2014	N/A	ICANN sent email to li@novaltel.net granting extension until 28 February 2014, and advised Registrar that failure to make



Date of Notice	Deadline for Response	Details
		payment will result in a notice of breach.
24-Feb-2014	N/A	ICANN called Primary Contact's number in RADAR (+86 10 8487 4199) and left message. ICANN called Primary Contact's mobile at (REDACTED) with no answer.
3-Mar-2014	N/A	ICANN conducted check to determine other areas of noncompliance.
7-Mar-2014	N/A	To date, no payment received by Registrar.