



The Internet Corporation for Assigned Names and Numbers

25 August 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

John He
Xin Net Technology Corporation (IANA #120)
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China

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RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Mr. He,

Please be advised that as of 25 August 2014, Xin Net Technology Corporation (“Xin Net”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 12 December 2013 (“RAA”). These breaches result from:

1. Failure to take reasonable steps to investigate and correct claimed Whois inaccuracies, as required by Section 3.7.8 of the RAA;
2. Failure to maintain registration data and records as required by Section 3.4.2 of the RAA;
3. Failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA; and
4. Failure to validate and verify the Whois contact information, as required by Sections 1, 2, and 4 of the Whois Accuracy Program Specification.

Please refer to the attachment for details regarding these breaches.

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In addition, Xin Net has been deemed noncompliant in the following areas:

1. Failure to publish on Xin Net's website the full name and position of all officers of the registrar, as required by Section 3.17 of the RAA and Section 17 of the Registrar Information Specification ("RIS") of the RAA;

ICANN requests that Xin Net cure the breaches by 15 September 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Xin Net took reasonable steps to investigate and reasonable steps to correct the Whois inaccuracy claims concerning the domain <sneakerstogo.com>. This includes copies of Xin Net's correspondence with the registrant and any responses received while investigating the Whois inaccuracy claims (including dates, times, means of inquiries, telephone numbers, e-mail addresses and postal addresses used); and
2. Publish on Xin Net's website the full name and position of all officers of Xin Net.

If Xin Net fails to timely cure the breaches and provide the information requested by 15 September 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 take reasonable steps to investigate and correct Whois inaccuracies

Section 3.7.8 and the Whois Accuracy Program Specification of the RAA requires registrars, upon notification of a claimed inaccuracy in the contact information associated with a registered name sponsored by registrar, to take reasonable steps to investigate the claimed inaccuracy. In the event the registrar learns of inaccurate contact information associated with a registered name it sponsors, the registrar shall take reasonable steps to correct that inaccuracy. Xin Net's failure to provide documentation demonstrating the reasonable steps it took to investigate and correct the alleged Whois inaccuracy is a breach of Section 3.7.8 and the Whois Accuracy Program Specification of the RAA.

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 registered name holder and registration data, including validation and verification of Whois data as required by the Whois Accuracy Specification, and to make those records available to ICANN upon reasonable notice.

As detailed in the chronology below, ICANN sent Xin Net three Whois inaccuracy compliance notices regarding the domain name <sneakerstogo.com> and requesting documentation supporting its investigation of alleged Whois inaccuracies. Xin Net's failure to provide the requested records is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to validate and verify updated Whois data

Section 1 of the Whois Accuracy Specification of the 2013 RAA requires registrars to validate that, required fields, including telephone numbers, postal addresses and email addresses, are in a standard format or template and verify the email address of the registrant by receiving an affirmative response from the registrant.

Section 2 of the Whois Accuracy Specification of the 2013 RAA requires registrars to perform validation and verification, as set forth in Section 1 of the Whois Accuracy Specification, if a registrar receives changes to any Whois contact information, whether or not contact information was previously verified or validated. The registrar is required to (1) receive an affirmative response from the registrant, (2) manually verify the information or (3) suspend the domain name.



Section 4 of the Whois Accuracy Specification of the 2013 RAA requires registrars to perform validation and verification, as set forth in Section 1 of the Whois Accuracy Specification, if a registrar has any information suggesting that the contact information specified in the Whois is incorrect. The registrar must also (1) verify (or re-verify) the registrant's email address by sending an email (and receiving an affirmative response), (2) manually verify the information or (3) suspend the domain name.

Xin Net's failure to provide documents demonstrating the validation and verification of the Whois data for the domain name <sneakerstogo.com> is a breach of the Whois Accuracy Specification of the RAA.

Failure to publish officer information on registrar's website

Section 3.17 of the RAA requires registrars to provide to ICANN and maintain accurate and current information as specified in the RIS of the RAA. In addition, a registrar must publish on each website through which the registrar provides or offers registrar services, the information specified in the RIS as requiring publication. Xin Net's failure to publish the full name and position of all its officers on its website is a breach of Section 3.17 of the RAA and the RIS.

Chronology:

Date of Notice	Deadline for Response	Details
10-Jul-2014	31-Jul-2014	ICANN sent 1st compliance notice via email to transfer@xinnet.com . No response received from Registrar.
1-Aug-2014	8-Aug-2014	ICANN sent 2nd compliance notice via email to transfer@xinnet.com .
5-Aug-2014	N/A	Email from Registrar (transfer@xinnet.com) with documentation insufficient to demonstrate compliance.
6-Aug-2014	N/A	ICANN called Primary Contact's mobile phone at [MOBILE REDACTED]. ICANN provided ticket information, including ticket ID and deadline. Primary Contact confirmed that he would take action and respond to ICANN. No response received from Registrar.



Date of Notice	Deadline for Response	Details
11-Aug-2104	18-Aug-2014	ICANN sent 3rd compliance notice via email to transfer@xinnet.com and admin1@xinnet.com . No response received from Registrar.
11-Aug-2014	N/A	ICANN faxed 3rd compliance notice to +86 10 8712 7010. Fax successful.
14-Aug-2014	N/A	ICANN called Primary Contact's mobile phone at [MOBILE REDACTED]. ICANN provided ticket information, including ticket ID and deadline. Primary Contact confirmed that he would take action and respond to ICANN.
19-Aug-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
19-Aug-2014	N/A	Email from Registrar (transfer@xinnet.com) indicated that the domain name was suspended, however the domain was operational when ICANN attempted to verify.
21-Aug-2014	N/A	Email from Registrar (transfer@xinnet.com) indicated that the Whois information was changed, however no supporting documentation was provided.
25-Aug-2014	N/A	To date, the claimed inaccuracy still exists and registrar has not provided documentation sufficient to demonstrate compliance.