



The Internet Corporation for Assigned Names and Numbers

24 September 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Kwon-soo Jeong  
Dotname Korea Corp. (IANA #1132)  
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Seoul  
Korea (South)

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

Dear Mr. Jeong,

Please be advised that as of 24 September 2014, Dotname Korea Corp. ("Dotname Korea") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 5 June 2014 ("RAA"). These breaches result from:

1. Dotname Korea's failure to maintain and make available registration data and records available upon request by ICANN, as required by Sections 3.4.2 and 3.4.3 of the RAA;
2. Dotname Korea's failure to take reasonable steps to investigate and correct claimed Whois inaccuracies, as required by Section 3.7.8 of the RAA;
3. Failure to validate and verify Whois contact information, as required by Sections 2 and 4 of the Whois Accuracy Program Specification ("WAPS");
4. Failure to suspend or terminate a domain name after the Registered Name Holder ("RNH") failed to respond for over fifteen (15) calendar days to inquiries by the registrar concerning Whois inaccuracies, as required by Section 5 of the WAPS; and

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5. 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”).

Please refer to the attachment for details regarding these breaches.

#### Additional Considerations

ICANN notes that Dotname Korea received notices of breach on 7 August 2014 and 17 July 2014 for the same issues identified in this notice of breach. Although Dotname Korea collaborated with ICANN, it did not cure the breaches and ICANN issued a notice of suspension on 22 September 2014. Failure to cure the breaches in this notice of breach will result in the termination of Dotname Korea’s RAA with ICANN.

ICANN requests that Dotname Korea cure the breaches by 15 October 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Dotname Korea took reasonable steps to investigate and correct the Whois inaccuracy claims concerning the domain name <qaos.com>. This includes: (a) copies of Dotname Korea’s correspondence with the RNH while investigating the Whois inaccuracy claims (including dates, times, means of inquiries, telephone numbers, e-mail addresses and postal addresses used); and (b) the steps Dotname Korea took to verify and validate the updated information;
2. Provide ICANN with corrective and preventative action(s), including implementation dates and milestones, to demonstrate that Dotname Korea’s systems and processes comply with the requirements of the 2013 RAA; and
3. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification.

If Dotname Korea fails to timely cure the breaches and provide the information requested by 15 October 2014, ICANN will 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 "MSerad", is written in a cursive style.

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. Dotname Korea's failure to provide the requested registration records is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

### Failure to take reasonable steps to investigate and correct Whois inaccuracies

Section 3.7.8 of the RAA requires registrars, upon notification of a claimed inaccuracy in the contact information associated with a registered name sponsored by a 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.

ICANN sent three compliance notices to Dotname Korea concerning a Whois inaccuracy report for the domain name <qaos.com> and requested Dotname Korea demonstrate that it took reasonable steps to investigate the Whois inaccuracy claims. Dotname Korea'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 of the RAA.

### Failure to validate and verify updated Whois data

Section 1 of the WAPS 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, as well as verify the email address of the registrant by receiving an affirmative response from the registrant.

Section 2 of the WAPS 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 WAPS 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 receiving an affirmative response, (2) manually verify the information, or (3) suspend the domain name.

Dotname Korea's failure to respond or provide documents demonstrating validation and verification of the Whois data is a breach of the WAPS of the RAA.

#### Failure to use 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. Dotname Korea's failure to display Whois data in the specified format, is a breach of Section 1.4 of the Whois Specification of the RAA.

#### **Chronology:**

#### **TICKET ID: NMF-545-66700 (Whois Inaccuracy)**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
7-Aug-2014	28-Aug-2014	ICANN sent 1st compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> and <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> . No response received from Registrar.
29-Aug-2014	9-Sep-2014	ICANN sent 2nd compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> and <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> . No response received from Registrar.
3-Sep-2014	N/A	ICANN called Primary Contact at +82-10-70-7090-0826 and at mobile [MOBILE REDACTED]. No answer and no ability to leave messages at either number.
10-Sep-2104	17-Sep-2014	ICANN sent 3rd compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> , <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> , and <a href="mailto:domaindoc@dotname.co.kr">domaindoc@dotname.co.kr</a> .
10-Sep-2014	N/A	ICANN faxed 3rd compliance notice to +82-05-0498-59800. Fax unsuccessful.

Date of Notice	Deadline for Response	Details
12-Sep-2014	N/A	ICANN called Primary Contact at +82-10-70-7090-0826 and at mobile at [MOBILE REDACTED]. No answer and no ability to leave messages at either number. ICANN called Public Contact at +82-070-7090-0811 and spoke to Registrar's Executive Director. ICANN communicated ticket details and left staff's direct number for questions. Registrar requested second copy of 3rd notice.
12-Sep-2014	17-Sep-2014	ICANN re-sent 3rd compliance notice via email to <a href="mailto:daniel@dotnamekorea.com">daniel@dotnamekorea.com</a> , <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> and <a href="mailto:domaindoc@dotname.co.kr">domaindoc@dotname.co.kr</a> .
16-Sep-2014	N/A	Email from Registrar ( <a href="mailto:daniel2014@forward.dnstool.net">daniel2014@forward.dnstool.net</a> ). Reply insufficient to demonstrate compliance.
17-Sep-2014	17-Sep-2014	ICANN sent follow up compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> , <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> , and <a href="mailto:domaindoc@dotname.co.kr">domaindoc@dotname.co.kr</a> . No response received from Registrar.
17-Sep-2014	N/A	ICANN called Primary Contact at +82-10-70-7090-0826 and at mobile at [MOBILE REDACTED]. No answer and no ability to leave messages at either number. ICANN called Public Contact at +82-070-7090-0811 and spoke to Registrar's Executive Director. ICANN communicated ticket details and left staff's direct number for questions.
19-Sep-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Sep-2014	N/A	Emails from Registrar ( <a href="mailto:daniel2014@forward.dnstool.net">daniel2014@forward.dnstool.net</a> and <a href="mailto:domaindoc@dotname.co.kr">domaindoc@dotname.co.kr</a> ). Replies insufficient to demonstrate compliance.
24-Sep-2014	N/A	Email from Registrar ( <a href="mailto:yhs626@dotnamekorea.com">yhs626@dotnamekorea.com</a> ) insufficient to demonstrate compliance. To date, the Registrar has not responded to ICANN with the requested information and documentation.

TICKET ID: WST-517-37596 (Whois Format)

Date of Notice	Deadline for Response	Details
7-Aug-2014	14-Aug-2014	ICANN sent 1st compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> and <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> .
11-Aug-2014	N/A	Email from Registrar ( <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> ). Reply insufficient to demonstrate compliance.
11-Aug-2014	14-Aug-2014	ICANN sent follow up compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> and <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> stating requirements in English and Korean. No response received from Registrar.
15-Aug-2014	22-Aug-2014	ICANN sent 2nd compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> and <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> . No response received from Registrar.
19-Aug-2014	N/A	ICANN called Primary Contact at +82-10-70-7090-0826 and at mobile at [MOBILE REDACTED]. No answer and no ability to leave messages at either number.
25-Aug-2104	3-Sep-2014	ICANN sent 3rd compliance notice via email to <a href="mailto:lsy7611@gmail.com">lsy7611@gmail.com</a> , <a href="mailto:suvt313@dotname.co.kr">suvt313@dotname.co.kr</a> , and <a href="mailto:domaindoc@dotname.co.kr">domaindoc@dotname.co.kr</a> . No response received from Registrar.
26-Aug-2014	N/A	ICANN called Primary Contact at +82-10-70-7090-0826 and at mobile at [MOBILE REDACTED]. No answer and no ability to leave messages at either number.
19-Sep-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Sep-2014	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation.