



The Internet Corporation for Assigned Names and Numbers

27 August 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Stephanie Kolaric  
Online SAS (IANA #74)  
8 Rue De La Ville L'Eveque  
Paris 75008  
France

Email: [icann@free.org](mailto:icann@free.org)  
Fax: +33 1 73 50 26 05

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

Dear Ms. Kolaric,

Please be advised that as of 27 August 2014, Online SAS is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 12 March 2014 (“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.

Los Angeles  
Offices:

12025 Waterfront Drive, Suite 300  
Beijing • Brussels •

Los Angeles, CA 90094 USA  
Istanbul • Montevideo •

T +1 310 301 5800  
• Singapore •

F +1 310 823-8649  
• Washington

<http://icann.org>



In addition, Online SAS has been deemed noncompliant in the following areas:

1. Failure to provide a description on Online SAS's website of renewal fees, post-expiration renewal fees (if different), and redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP");
2. Failure to provide a description on Online SAS's website of methods used to deliver pre- and post-expiration notifications on registrar's website, as required by Section 4.2 of the ERRP;
3. Failure to publish on Online SAS'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; and
4. Failure to display the correct ICANN logo on Registrar's website, as required by the Logo License Appendix of the RAA.

ICANN requests that Online SAS cure the breaches by 17 September 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Online SAS took reasonable steps to investigate and reasonable steps to correct the Whois inaccuracy claims concerning the domain <VincentSejourne.com>, including copies of Online SAS'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);
2. Clearly display a link to renewal fees, post-expiration renewal fees (if different), and redemption/restore fees on Online SAS's website;
3. Provide a description of methods used to deliver pre- and post-expiration notifications on Online SAS's website;
4. Publish on Online SAS's website the full name and position of all officers of Online SAS; and
5. Display the correct ICANN logo on Online SAS's website in accordance with the Logo License Appendix of the RAA.

If Online SAS fails to timely cure the breaches and provide the information requested by 17 September 2014, ICANN may commence the RAA termination process.



Stephanie Kolaric  
Online SAS

Page 3 of 7

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 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. Online SAS'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 Online SAS multiple Whois inaccuracy compliance notices regarding the domain name <VincentSejourne.com> and requesting documentation supporting its investigation of alleged Whois inaccuracies. Online SAS'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.

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

Failure to clearly display a link to renewal fees, post-expiration renewal fees (if different), and redemption/restore fees on registrar's website

Section 4.1 of the ERRP requires registrars to make their renewal fees, post-expiration renewal fees (if different), and redemption/restore fees reasonably available to registered name holders and prospective registered name holders at the time of registration of a gTLD name. At a minimum, these fees must be clearly displayed on the registrar's website and a link to these fees must be included in the registrar's registration agreements. Online SAS's website failure to provide a link or clearly display these fees is a breach of Section 4.1 of the ERRP.

Failure to describe on their websites (if used) the methods used to deliver pre- and post-expiration notifications.

Section 4.2 of the ERRP requires registrars to describe on their websites (if used) the methods used to deliver pre- and post-expiration notifications for renewal of domain registrations. Online SAS's failure to describe these notifications on the website is a breach of Section 4.2 of the ERRP.

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. Online SAS'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.

Failure to display correct ICANN-Accredited Registrar logo

The Logo License Specification of the RAA requires registrars, if displaying the ICANN-Accredited Registrar Logo, to use the logo displayed in the appendix. Online SAS's use of a modified version of the ICANN-Accredited Registrar Logo is a violation of the Logo License Appendix of the RAA.

**Chronology:**

Date of Notice	Deadline for Response	Details
8-Jul-2014	29-Jul-2014	ICANN sent 1st compliance notice via email to <a href="mailto:icann-whois@free.org">icann-whois@free.org</a> .
9-Jul-2014	N/A	Email from Registrar ( <a href="mailto:skolaric@online.net">skolaric@online.net</a> ) indicated that the Whois data had been updated. Supporting documentation was insufficient.
10-Jul-2014	29-Jul-2014	ICANN sent a follow-up via email to Registrar ( <a href="mailto:icann-whois@free.org">icann-whois@free.org</a> ) regarding Registrar's incomplete response and detailing specific documentation required to demonstrate compliance. No response received from Registrar.
30-Jul-2014	6-Aug-2014	ICANN sent a 2nd compliance notice via email to <a href="mailto:icann-whois@free.org">icann-whois@free.org</a> and <a href="mailto:skolaric@online.net">skolaric@online.net</a> . No response received from Registrar.
6-Aug-2014	N/A	ICANN called Primary Contact at +33 1 73 50 20 00. No answer. No ability to leave a voice-mail.
8-Aug-2014	15-Aug-2014	ICANN sent 3rd compliance notice via email to <a href="mailto:icann-whois@free.org">icann-whois@free.org</a> , <a href="mailto:skolaric@online.net">skolaric@online.net</a> , and <a href="mailto:icann@free.org">icann@free.org</a> .
8-Aug-2014	N/A	ICANN sent 3rd compliance notice via fax to +33 1 73 50 26 05. Fax unsuccessful.
11-Aug-2014	N/A	Email from Registrar ( <a href="mailto:jcmichot@bookmyname.com">jcmichot@bookmyname.com</a> ) indicated that the Whois information had been updated. However, no further information or supporting documentation was provided.

Date of Notice	Deadline for Response	Details
11-Aug-2014	15-Aug-2014	ICANN sent a follow-up to the registrar via email to <a href="mailto:icann-whois@free.org">icann-whois@free.org</a> , <a href="mailto:skolaric@online.net">skolaric@online.net</a> , and <a href="mailto:icann@free.org">icann@free.org</a> regarding Registrar's incomplete response and detailing specific documentation required to demonstrate compliance.
12-Aug-2014	N/A	Email from Registrar ( <a href="mailto:jcmichot@bookmyname.com">jcmichot@bookmyname.com</a> ) with documentation insufficient to demonstrate compliance.
12-Aug-2014	15-Aug-2014	ICANN sent a follow-up to the registrar via email to <a href="mailto:icann-whois@free.org">icann-whois@free.org</a> , <a href="mailto:skolaric@online.net">skolaric@online.net</a> , <a href="mailto:icann@free.org">icann@free.org</a> , and <a href="mailto:jcmichot@bookmyname.com">jcmichot@bookmyname.com</a> regarding Registrar's incomplete response and detailing specific documentation required to demonstrate compliance. No response received from Registrar.
14-Aug-2014	N/A	ICANN called Primary Contact twice at +33 1 73 50 20 00. Answered by automated message, "the telephone was disconnected and that business hours were between 8am to 8pm." ICANN called Corporate Contact's mobile phone number at [MOBILE REDACTED]. Left a message including ticket ID, domain name, due date and direct line in case of any questions.
15-Aug-2014	N/A	ICANN called Primary Contact four times at +33 1 73 50 20 00. All attempts were unsuccessful. The calls did not connect.
19-Aug-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
27-Aug-2014	N/A	To date, the Registrar has not provided ICANN with the requested information and documentation to demonstrate compliance.