



The Internet Corporation for Assigned Names and Numbers

3 October 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Lisa Mason
Internettters Limited (IANA #424)
Lister Pavilion, Kelvin Campus West of Scotland Science Park
Glasgow G20 OSP
United Kingdom

Email: lisa@iomart.com
Fax: +44 141 931 6785

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Ms. Mason,

Please be advised that as of 3 October 2014, Internettters Limited (“Internettters”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 18 December 2013 (“RAA”). These breaches result from:

1. Internettters’ failure to provide a policy consistent with the requirements of Section 2.1 of the Expired Registration Recovery Policy (“ERRP”) to send expiration reminder notices approximately one month and one week prior to expiration and within 5 days after expiration;
2. Internettters’ failure to send renewal reminders to the Registered Name Holder (“RNH”), as required by Section 2.1.1 of the ERRP;
3. Internettters’ failure to interrupt the DNS resolution path from the expiration of the registration until its deletion, as required by Section 2.2 of the ERRP; and
4. Internettters’ 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.

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Please refer to the attachment for details regarding these breaches.

In addition, Internettters has been deemed noncompliant in the following area:

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

ICANN requests that Internettters cure these breaches by 24 October 2014, 21 days from the date of this letter, by taking the following actions:

1. Provide ICANN with a remediation plan, including dates and milestones, to ensure Internettters will send expiration reminder notices to the RNHs of domains that it sponsors at the intervals required by the ERRP and interrupt the DNS resolution path from the expiration of a registration until deletion, as required by the ERRP; and
2. Publish on Internettters' website the full name and position of all officers of Internettters.

If Internettters fails to timely cure the breaches and provide the information requested by 24 October 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 send expiration reminder notices at required intervals

Section 2.1 of the ERRP requires registrars to notify the RNH of the expiration of a domain name at specific intervals. Pre-expiration reminder notices must be sent approximately one month prior to expiration and approximately one week prior to expiration. If a registration is not renewed by the RNH or deleted by the registrar, registrars must also send a post-expiration reminder notice within five days after expiration of the registration. Internettters' website posts a policy that does not comply with Section 2.1 of the ERRP and the failure to send expiration reminder notices at the required intervals is a breach of Section 2.1 of the ERRP.

Failure to send renewal reminders to the RNH

Section 2.1.1 of the ERRP requires registrars to notice the RNH of the expiration of the domain name at least two times. Internettters' failure to send renewal notices to the RNH is a breach of Section 2.1.1 of the ERRP.

Failure to disrupt the DNS resolution path

Section 2.2 of the ERRP requires the existing DNS resolution path specified by the registrant at expiration be interrupted by the registrar from expiration of the registration until its deletion, to the extent the applicable registry permits such interruptions. Internettters' failure to interrupt the DNS resolution path of domains it sponsors is a violation of Section 2.2 of the ERRP.

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. Internettters' failure to provide the requested registration records and data related to the compliance notices detailed in the chronologies below is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to publish the full name and position of all officers 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 it provides or offers registrar services, the information specified in the RIS as requiring

publication. Internettters' 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
11-Jul-2014	18-Jul-2014	ICANN sent 1st compliance notice via email to lisa@iomart.com .
14-Jul-2014	N/A	Email from Registrar (lisa@iomart.com) insufficient to demonstrate compliance.
18-Jul-2014	18-Jul-2014	ICANN sent follow up compliance notice via email to lisa@iomart.com .
21-Jul-2014	N/A	Email from Registrar (dns@iomart.com) insufficient to demonstrate compliance.
14-Aug-2014	21-Aug-2014	ICANN sent 2nd compliance notice via email to lisa@iomart.com .
19-Aug-2014	N/A	Email from Registrar (alyson.lamond@iomart.com) insufficient to demonstrate compliance.
25-Aug-2014	N/A	ICANN called Primary Contact at +44 141 931 6400, +44 141 931 6442 and at mobile [MOBILE REDACTED], and left messages with complaint details and staff's direct number for questions.
25-Aug-2014	3-Sep-2014	ICANN sent follow up compliance notice via email to lisa@iomart.com .
28-Aug-2104	N/A	Email from Registrar (lisa@iomart.com) insufficient to demonstrate compliance.
9-Sep-2014	12-Sep-2014	ICANN sent follow up compliance notice via email to lisa@iomart.com .

Date of Notice	Deadline for Response	Details
9-Sep-2014	N/A	ICANN spoke with Primary Contact at +44 141 931 6400. Registrar was provided complaint details, was asked to reply to the compliance notice and was provided staff's direct line for questions.
10-Sep-2014	N/A	Email from Registrar (lisa@iomart.com) insufficient to demonstrate compliance.
18-Sep-2014	25-Sep-2014	ICANN sent 3rd compliance notice via email to lisa@iomart.com .
18-Sep-2014	N/A	ICANN faxed 3rd compliance notice to +44 141 931 6785. Fax successful.
18-Sep-2014	N/A	Email from Registrar (lisa@iomart.com) insufficient to demonstrate compliance.
23-Sep-2014	25-Sep-2014	ICANN sent follow up compliance notice via email to lisa@iomart.com .
24-Sep-2014	N/A	ICANN spoke with Primary Contact at +44 141 931 6400. Registrar was provided complaint details and was asked to reply to the compliance notice.
24-Sep-2014	N/A	Email from Registrar (lisa@iomart.com) insufficient to demonstrate compliance.
25-Sep-2014	N/A	ICANN called at Primary Contact at +44 141 931 6400. Primary Contact was unavailable but staff informed Registrar's receptionist of compliance notice due date and that Registrar's response remained insufficient.
29-Sep-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
3-Oct-2014	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation.