



26 April 2013

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE AND COURIER

Murat Yaniklar  
Ground Internet, Inc. (IANA ID# 936)  
Sarkarya Cd. No. 115  
Osmangazi Bursa 16050  
Turkey

E-mail: [info@groundinternet.com](mailto:info@groundinternet.com)  
Fax Number: +90 224 2249520

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

Dear Mr. Yaniklar:

Please be advised that as of 26 April 2013, Ground Internet Inc., is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 25 September 2009 (“RAA”). This breach results from:

- Failure to pay past due accreditation fees pursuant to Section 3.9 of the RAA.

Please refer to the attachment for details regarding this breach. ICANN requests that Ground Internet Inc., cure this breach by 17 May 2013, 15 working days from the date of this letter, by taking the following actions:

- Pay all past due accreditation fees in the amount of \$25,033.10. Please see the enclosed customer statement for details.

If Ground Internet Inc., fails to timely cure this breach by 17 May 2013, ICANN may commence the RAA termination process.

Washington, DC	1101 New York Avenue, NW, Suite 930	Washington, DC 20005	USA	T +1 202 570 7240	F +1 202 789 0104
Los Angeles	12025 Waterfront Drive, Suite 300	Los Angeles, CA 90994	USA	T +1 310 823 9358	F +1 310 823 8649
Brussels	6 Rond Point Schuman, Bt. 5	B-1040 Brussels	BELGIUM	T +32 2 234 7870	F +32 2 234 7848
Sydney	Level 2, 48 Hunter Street	Sydney NSW 2000	AUSTRALIA	T +61 2 8236 7900	F +61 2 8236 7913



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If you have questions or require assistance, please contact Stacy Burnette at [stacy.burnette@icann.org](mailto:stacy.burnette@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad". The signature is fluid and cursive, with the first letter "M" being particularly large and stylized.

Maguy Serad  
Vice President  
Contractual Compliance

c: John O. Jeffrey, General Counsel and Secretary

Enclosure: Customer Statement



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## ATTACHMENT

### 1. 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. Ground Internet Inc., currently owes ICANN \$25,033.10 in past due accreditation fees.

Ground Internet Inc., failed to comply with its obligation to timely pay accreditation fees and this failure constitutes a breach of Section 3.9 of the RAA.

### Chronology

Date of Notice	Deadline for Response	Details
14-Nov-12 10-Jan-13 2-Feb-13	Within 30 days	Notices regarding Ground Internet, Inc.'s past due accreditation fees, including detailed customer statements, were transmitted by ICANN's Finance department.
25-Feb-13	4-Mar-13	ICANN sent first Compliance notice via e-mail to <a href="mailto:info@groundinternet.com">info@groundinternet.com</a> . Registrar did not respond.
7-Mar-13	14-Mar-13	ICANN sent second Compliance notice via e-mail to <a href="mailto:info@groundinternet.com">info@groundinternet.com</a> . Registrar did not respond.



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Date of Notice	Deadline for Response	Details
18-Mar-13	25-Mar-13	ICANN sent third Compliance notice via e-mail to <a href="mailto:info@groundinternet.com">info@groundinternet.com</a> and fax at +90 224 2249520. Registrar did not respond.
26-Mar-13 4-Apr-13	N/A	ICANN attempted contacting the registrar via the only telephone number listed in Radar +90 224 2248640. Registrar did not respond and there was no option to leave a message.