

COMPLAINT

ICANN Complaint Submission

1. Complainant Information

Name: Ashley Roberts

Organisation: Valideus Ltd.

Postal Address: [REDACTED]

Email: [REDACTED]

Phone number: [REDACTED]

2. Short description (25 words or less)

Ongoing issues with the receipt of registry invoices. We would like these issues to be addressed and resolved.

3. Dates the complaint occurred

2014 - present

4. Detailed description of the complaint

We have a number of .brand registry clients for whom we receive and pay their ICANN invoices for quarterly registry fees. As well as assisting our clients with the payment of their bills, we also view this as being beneficial to ICANN as it means they only have to deal with one party instead of 10-15 different parties, we have a good working relationship with ICANN staff, and we have a good understanding of ICANN requirements and processes. However, since we began receiving the first of our clients' invoices we have experienced various regular and ongoing issues with ICANN's accounting department including the following:

- Inconsistent methods of receipt of Invoices: Some invoices are received by regular mail and some by email despite requesting all invoices to be sent by email;
- Invoices delivered to the wrong address or registry;
- Failure to deliver invoices;
- Inaccurate and incorrect invoices received. We have received a number of invoices for entities we do not represent and understand that some invoices of our customers have been delivered to other third parties;
- Failure to cure these issues despite multiple notices of these issues.

Since 2014, we have had multiple conversations and face-to-face meetings with ICANN staff to highlight the problems and have tried and resolve them, but unfortunately many of the issues still persist. We are therefore filing this complaint with a view to raising the profile of this matter in the hope of successfully addressing these errors once and for all. We provide below a chronological (though not exhaustive) list of the challenges we have faced.

Q4 2014:

We received a quarterly invoice which, though emailed to the correct billing contact, was also emailed to the primary contact of a different registry operator. Although the second registry operator was also a client of ours, this error could potentially have exposed sensitive information to a third party, and suggested a problem with ICANN's processes. We immediately pointed out the

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error to ICANN's accounting team, requesting that they correct their records. Without receiving a clear explanation of what had caused the error, ICANN confirmed that the billing contact details had been corrected¹.

Q1 2015:

The same error, involving the same clients, was repeated. This was again raised with ICANN's accounting team, who responded that the corrective changes in the previous quarter had not been saved in the system².

In addition, there were a number of TLDs for which we did not receive invoices, requiring us to escalate the matter to our engagement manager in order for it to be addressed. When the missing invoices were eventually received some of them did not specify which TLD they related to, causing further delay whilst ICANN's accounting team reissued and re-sent them to us³. ICANN's explanation for these problems suggested the root cause was that it was a largely manual process to generate the billing contact information for the invoices and to issue them. ICANN accounting staff could not give us a timescale for resolving the process difficulties. In this same correspondence we clarified that all invoices should be sent to our main billing contact email address, [REDACTED] as previously notified via the GDD portal⁴.

June 2015:

We met with ICANN GDD and finance staff at ICANN 53 to outline the various problems we had been experiencing and seek action to address them. We were again told that the difficulties were primarily due to the billing process being predominantly manual. We were assured that steps would be taken to fix the issues and that in the longer term ICANN would be moving to a more automated billing system.

September 2015:

As part of the follow up from our meeting at ICANN 53, ICANN staff reached out to us and asked us to confirm which TLDs we were the designated billing contact for. We duly confirmed by reply and instructed that for each of those TLDs ALL of the associated invoices should be sent by email - to our billing contact email address [REDACTED]⁵, - rather than regular mail as had been happening sporadically.

Despite this, the next quarter some invoices were again sent by regular mail. Furthermore, we did not receive all of our invoices and we again had to chase ICANN to have them issued⁶.

2016:

Although there were slightly fewer problems during 2016 there were still intermittent instances of the same issues. For example, some invoices were again sent to the primary contact of another registry we work with⁷. Of greater concern, due to the data privacy and confidentiality issues, we

¹ See attachment "Re_2014 December Quarter Invoice".

² See attachment "Re_March 2015 Quarter Invoice".

³ See attachment "Re_Latest quarterly bills".

⁴ See attachment "Re_March 2015 Quarter Invoice".

⁵ See attachment "Re_List of TLDs Sept 2015".

⁶ See attachment "Re_September 2015 Quarter Invoice".

⁷ See attachment "FW_December 2015 Quarter Invoice".

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also received an invoice for a registry we do not represent. We shredded it and informed ICANN accounting.

There were also further cases of invoices not being sent to us, requiring us to chase ICANN accounting for them⁸.

June 2017:

It is our understanding that around the end of 2016 or start of 2017 ICANN began implementing a new, more automated billing system to try and address the manual errors that had been prevalent for the past two years. Unfortunately, this has not marked the end of the problems.

In June 2017 we received a number of “first notices” from ICANN for past due fees, one for each of the TLDs for which we are the billing contact. We knew that we were up to date with the payment of all ICANN invoices we had received, and upon investigating it became apparent that all of the “overdue” amounts were for \$35 and related to invoices we had already paid. This suggests to us that perhaps some bank fees had been deducted from our wire transfers, leaving a small shortfall. There were multiple issues with these notifications:

- Some of the notice emails were sent to the wrong email address. Three of them were sent to the abuse point of contact for the TLD. Upon questioning ICANN accounting staff as to why this address had been used, we were told that we “hadn’t provided ICANN with a billing contact email”. This is incorrect – the relevant contact details were submitted to the GDD portal and have been unchanged since 2014⁹. Clearly there appears to be an operational disconnect between GDD operations and the finance team.
- We asked ICANN accounting staff to investigate whether ICANN’s bank may have deducted bank charges from the amounts we had wired. In due course, this was confirmed and we were told that this had slipped through the net due to the move to the new billing system¹⁰. While it is understandable that there might be teething troubles with a new system, good practice would expect sense checks to identify and investigate why at least 20 TLDs (that we are aware of) all had a shortfall of the same small amount, before erroneously issuing overdue fee notices to multiple TLDs.
- The emails were labelled as “first notices of past due fees”, which is unduly alarming and has the tone of a compliance notice. In addition to the concern this caused us, it also caused us embarrassment with our clients, who rely on us to ensure that they remain in compliance by paying their fees in a timely manner. For some of those clients, internal or external reporting obligations might also be triggered by such a notice of an apparent compliance breach. Irrespective of the fact that the notices were sent by ICANN accounting in error, in such cases where there appears to have been a shortfall in a payment rather than no payment made at all, it would seem more prudent and less accusatory to first contact the billing contact and inform them of the shortfall so that they can investigate and remedy, before issuing an overdue notice. Although ICANN staff have acknowledged that the payment shortfalls were due to their error, and that we do not need to pay the \$35 overdue accounts, we were given no apology for the inconvenience and concern this caused, nor have we received corrections to the erroneous overdue notices which were issued, in spite of requests for such.

⁸ See attachment “Re_missing invoices”.

⁹ See attachment “Incorrect email”.

¹⁰ See attachment “Re_First notice – Past Due Fees to ICANN”.

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One final recent issue is worthy of mention. For one of our clients' TLDs we received a first notice for overdue fees relating to non-payment for an entire quarter's fees. However, we had never received the original invoice to which the fees related. Upon further investigation by ICANN accounting it transpired that they had sent the invoice to the old billing contact, which was a previous vendor of the client. Those billing contact details were updated by us in the GDD portal as long ago as June 2016. It transpires that all invoices since June 2016 for this TLD had been sent to the old vendor in error, yet another example of the GDD details not being used by the finance team.

5. Any steps taken to try and resolve the matter

Please see section 4 above.

6. How we believe the complaint can be addressed by ICANN

Primarily, we would like the various problems with the billing system to be fixed so that we do not encounter further problems. Until you can be confident that this is the case, we would expect manual checks to be conducted - for example to double check before issuing breach notices to ensure that the error is not on ICANN's side.

One solution which would cure many of these problems and should be relatively simple to implement would be to ensure the finance team use the billing contact information listed in the GDD portal. One of the most frustrating aspects of this has been that for the entire period ICANN has had correct billing contact information in its GDD portal, yet over and over again invoices have been sent to incorrect contacts.

It would be helpful to know what kind of billing system ICANN is operating and the various operational processes which are in place, in order to try and understand how the same problems keep recurring on a regular basis. Specifically, we have the following questions:

- How does ICANN's registry invoicing system work?
- To what extent is the process of generating and issuing registry invoices automated and what is automated?
- Which elements of the process are manual?
- Does the system have the ability to pull billing contact data from the GDD portal or is that a manual step?
- How often is the data pulled (whether manual or automatic), i.e. will it pick up recent changes to billing contact information in the GDD portal?
- Do ICANN's finance team hold the billing contact information in a separate database?
- How do the accounting team update changes to the contact information and ensure it filters through to future invoices?
- Are any reports run or sense checks employed before invoices and overdue fee notices are sent out in order to try and identify obvious errors?
- How will ICANN address the issues highlighted in this complaint, and what are the estimated timelines for implementation of the solutions?

7. Please describe whether anyone else would be affected by circumstances leading to this complaint and how. Please also describe if anyone else could be affected by your proposed solution and how.

Although we do not profess to speak on behalf of other gTLD registries that we do not represent, based on anecdotal information we believe that a large number of them have experienced similar

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difficulties with ICANN's billing and invoicing system, so a solution to our complaint is likely to benefit many 2012-round gTLD registries.

8. *Additional documents to submit?*

See attachments.

ATTACHMENT 1

From: [Ashley Roberts](#)
To: [ICANN Accounting](#)
Bcc: [Dietmar Lenden](#) ([REDACTED])
Subject: RE: 2014 December Quarter Invoice
Date: 27 February 2015 15:29:13

Hi [REDACTED],

Thank you for clarifying this. I am glad to hear that the technical issue with the billing system has been resolved.

Kind regards,
Ashley

Ashley Roberts
Senior Manager | Valideus Ltd
E: [REDACTED]
D: [REDACTED]

From: ICANN Accounting [mailto:accounting@icann.org]
Sent: 26 February 2015 00:24
To: Ashley Roberts
Subject: RE: 2014 December Quarter Invoice

Hi Ashley,

On 13 October 2014, we received an email from our customer service department stating the registry op is requesting for all invoices to be emailed to [REDACTED]. Please note all invoices are sent via postal mail and by email upon request. As stated below we(ICANN) had an issue with our billing system uploading the wrong billing information, we have updated all customers account.

Regards,

[REDACTED]
Finance Dept., ICANN
12025 Waterfront Suite 300
Los Angeles, CA 90094

From: Ashley Roberts [mailto:[REDACTED]]
Sent: Thursday, February 19, 2015 2:48 AM
To: ICANN Accounting
Subject: RE: 2014 December Quarter Invoice

Hi [REDACTED],

Thanks for your email. However, I am still confused by ICANN's process for sending out invoices. You say that invoices are sent via postal mail, yet we have been receiving invoices via email

ATTACHMENT 1

without having requested that they be sent by email, so this does not make sense. Also, for [REDACTED] we have already requested that all of their invoices be sent via email so I do not understand why the latest one was sent by post. Can you please confirm that your system now has a note that all future [REDACTED] invoices should be sent by email? To be totally clear, we want to receive all invoices by email.

Also, I don't feel my question below has been answered. Can you please explain how the [REDACTED] invoice was emailed to the primary contact for [REDACTED]? Was this due to a system fault (and if so, what kind of fault?) or was it due to a manual error?

Thank you,
Ashley

Ashley Roberts
Senior Manager | Valideus Ltd
E: [REDACTED]
D: [REDACTED]

From: ICANN Accounting [<mailto:accounting@icann.org>]
Sent: 18 February 2015 23:31
To: Ashley Roberts
Subject: RE: 2014 December Quarter Invoice

Dear Ashley,

All customer invoices are sent via postal mail a per request invoices are sent by email to the billing address list it in sales force. We discovered a system error in our billing that delay the invoices.

Regards,

[REDACTED]
Finance Department
ICANN
12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Ashley Roberts [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Friday, February 13, 2015 5:54 AM
To: ICANN Accounting
Subject: RE: 2014 December Quarter Invoice

Hi [REDACTED],

Thank you for your reply. I have a couple of follow up comments and questions. Firstly, thank you for extending the due date. I believe that we previously requested the all invoices for [REDACTED] be sent out by email rather than regular mail. Is there some way to mark this on your billing system,

ATTACHMENT 1

as e-invoices are much easier for us to process?

Secondly, it is fine for Dietmar to remain as the billing POC for [REDACTED] (he is my colleague). What I want to make sure of is that the correct email address is used for the billing POC. When you mention that the billing system provided the wrong address, are you referring to the email address? In other words, was the use of a [REDACTED] email address a manual or a system error? I am not trying to pin blame, I just want to understand how the issue occurred so that we can mitigate it happening again. If it was a manual error, that is probably less of a concern (manual errors will occur from time to time), but if it is a system error it suggests potential for further problems so a fix for the system bug will be needed. I would be grateful if you could confirm.

Many thanks,
Ashley

Ashley Roberts
Senior Manager | Valideus Ltd
E: [REDACTED]
D: [REDACTED]

From: ICANN Accounting [<mailto:accounting@icann.org>]
Sent: 13 February 2015 00:26
To: Ashley Roberts
Subject: RE: 2014 December Quarter Invoice

Hi Ashley,

Sorry for the delay.

We had an issue with our billing system providing the wrong address for each invoice and I updated each invoice manually. The invoices were sent via postal mail. We will extend the due date to 3/11/2015.

Salesforce has Dietmar Lenden listed as the billing POC, please update the billing information in Salesforce.

Thank you,

[REDACTED]
Finance Dept., ICANN
12025 Waterfront Suite 300
Los Angeles, CA 90094

From: Ashley Roberts [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Wednesday, February 11, 2015 5:54 PM
To: ICANN Accounting
Subject: RE: 2014 December Quarter Invoice

Hi [REDACTED],

ATTACHMENT 1

Thank you for sending this invoice through – we will proceed to pay it.

I do, however, wish to clarify a couple of points. Firstly, the invoice lists the invoice date as the 30th of January, yet we only received it today. Can you please explain this discrepancy.

Also, as well as being sent to the correct billing contact, the invoice was also sent to an incorrect contact, namely the registry primary contact for [REDACTED] (a completely different registry operator). In this case it is not a major problem as we are acting as the billing contact for both registries, but I would like you to investigate how this happened to try and mitigate against it happening again. If a future invoice was accidentally sent to a registry which we are not affiliated with then there could be confidentiality issues. I'd be grateful if you could get back to me on this.

Many thanks,
Ashley

Ashley Roberts
Senior Manager | Valideus Ltd
E: [REDACTED]
D: [REDACTED]

From: ICANN Accounting [<mailto:accounting@icann.org>]
Sent: 11 February 2015 17:35
To: Billing; [REDACTED]
Subject: 2014 December Quarter Invoice

Dear Registry Operator,

Attached is your December quarter invoice. Please contact accounting@icann.org if you have any questions. .

Regards,

[REDACTED]
Finance Dept., ICANN
12025 Waterfront Suite 300
Los Angeles, CA 90094

ATTACHMENT 2

From: [ICANN Accounting](#)
To: [Billing](#)
Subject: RE: March 2015 Quarter Invoice
Date: 26 May 2015 21:25:04

Dear Ashley,

Thank you for your email and comprehension. We are working on it.

Regards,

[REDACTED]
Finance Department
ICANN
12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Billing [mailto:[REDACTED]]
Sent: Tuesday, May 26, 2015 4:41 AM
To: ICANN Accounting
Subject: RE: March 2015 Quarter Invoice

Dear [REDACTED],

Thank you for your email. Please provide all invoices to [REDACTED], in line with the billing contact information in the GDD platform.

Do you have any idea when the problem with ICANN's billing system will be fixed?

Kind regards,
Ashley

From: ICANN Accounting [<mailto:accounting@icann.org>]
Sent: 18 May 2015 19:17
To: Billing
Subject: RE: March 2015 Quarter Invoice

Dear Ashley,

Invoices were sent manually and it was a human error. We sent invoices to Ashley Roberts email because for some reason the email updates made last quarter were not saved in our system. We took her email out from our email list to avoid confusions in the future. We will send all your invoices to [REDACTED] only.

If you want us to send [REDACTED] invoices to Ashley Roberts email, please provide all registries (TLD's and customer numbers) under you and contact email for each registry

ATTACHMENT 2

Kind Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Thursday, May 14, 2015 6:33 AM

To: ICANN Accounting

Subject: RE: March 2015 Quarter Invoice

Hi [REDACTED],

Thanks for your email. Can you please confirm exactly what you mean? If you removed the Ashley Roberts email from the [REDACTED] invoice list then that is great, but it still needs to remain on the general invoice list so that it can receive invoices for [REDACTED]. Can you please clarify?

Also, do you have an idea when this problem with the billing system will be fixed so that things no longer have to be done manually?

Kind regards,
Ashley

From: ICANN Accounting [<mailto:accounting@icann.org>]

Sent: 13 May 2015 17:54

To: Billing

Subject: RE: March 2015 Quarter Invoice

Dear Dietmar,

We took out Ashley Roberts email from our invoice email list.

Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Wednesday, May 13, 2015 12:46 AM

ATTACHMENT 2

To: ICANN Accounting

Subject: RE: March 2015 Quarter Invoice

Hi [REDACTED],

Thank you for this. Please can you make sure that you do not send these emails to [REDACTED] as this is a different client and they should NOT be seeing the bills for [REDACTED].

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

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From: ICANN Accounting [<mailto:accounting@icann.org>]

Sent: 12 May 2015 23:09

To: [REDACTED]; [REDACTED]

Subject: March 2015 Quarter Invoice

Dear Registry,

Attached is your 2015 March quarter invoice. Please contact accounting@icann.org if you have any questions.

Regards,

[REDACTED]
Finance Department
ICANN
12025 Waterfront Dr. Ste 300

ATTACHMENT 2

Los Angeles, CA 90094-2536 USA

ATTACHMENT 3

From: [Billing](#)
To: [REDACTED]
Subject: RE: Latest quarterly bills
Date: 21 May 2015 09:02:24
Attachments: [image001.png](#)

Hi [REDACTED],

This has now been resolved and thank you for your assistance in this matter.

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 21 May 2015 06:17
To: Billing
Subject: Re: Latest quarterly bills

Dear Dietmar,

I have been informed by our Accounting team that all invoices are revised (with the TLD information) and sent to you yesterday.

Please let me know if there are still issues.

Kind Regards,

[REDACTED]
[REDACTED]

ATTACHMENT 3

ICANN – Internet Corporation for Assigned Names and Numbers

[REDACTED]

T: [REDACTED]



From: [REDACTED]

Date: Wednesday, May 20, 2015 3:16 PM

To: Billing <[REDACTED]>

Subject: Re: Latest quarterly bills

Dear Dietmar,

I have been informed by our Accounting team that the missing invoices were sent yesterday. I am now trying to find out which TLDs those two invoices are for.

I will let you know once I have more information.

Kind Regards,

[REDACTED]

[REDACTED]

ICANN – Internet Corporation for Assigned Names and Numbers

[REDACTED]

T: [REDACTED]



From: Billing <[REDACTED]>

Date: Monday, May 18, 2015 1:21 PM

To: [REDACTED], ICANN Accounting <accounting@icann.org>

Subject: RE: Latest quarterly bills

Hi [REDACTED],

I received [REDACTED] invoices for [REDACTED] by post this morning (about 10 minutes ago). Unfortunately 2 of the invoices (Invoice number [REDACTED] and [REDACTED]) do not say who they are for and we do not know which of the [REDACTED].BRANDS we are paying for. I received [REDACTED] INVOICES by post [REDACTED] is the only one which has a name on it) and I'm still missing 2 invoices for [REDACTED].

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

ATTACHMENT 3

E:
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F:

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From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: 18 May 2015 09:10
To: [REDACTED]
Subject: FW: Latest quarterly bills

Hi [REDACTED],

How are you doing?

I hope you can help me. I'm still awaiting our quarterly bills for the following TLD's – are you able to chase the Accounts team (I have tried without any luck).

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dietmar Lenden
Client Project Manager and Validation Services Team Lead | Valideus Ltd

E:
D:
T:
F:

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[REDACTED]

From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: 15 May 2015 17:11

To: 'ICANN Accounting'

Cc: Billing

Subject: RE: Latest quarterly bills

Hi,

I have only received the [REDACTED] quarterly bill so far – when may the others be sent to the respective contact email addresses?

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

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[REDACTED]

From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: 11 May 2015 15:54

To: 'ICANN Accounting'

Cc: Billing

ATTACHMENT 3

Subject: Latest quarterly bills

Hi,

I'm following up to see when you will be sending the latest quarterly bills and also double checking that you will be emailing those to the relevant billing contact email address.

We are awaiting invoices for the following registries:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thank you in advance for your help.

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

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[REDACTED]

ATTACHMENT 4

From: [ICANN Accounting](#)
To: [Billing](#)
Subject: RE: March 2015 Quarter Invoice
Date: 26 May 2015 21:25:04

Dear Ashley,

Thank you for your email and comprehension. We are working on it.

Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Billing [mailto:[REDACTED]]
Sent: Tuesday, May 26, 2015 4:41 AM
To: ICANN Accounting
Subject: RE: March 2015 Quarter Invoice

Dear [REDACTED],

Thank you for your email. Please provide all invoices to [REDACTED], in line with the billing contact information in the GDD platform.

Do you have any idea when the problem with ICANN's billing system will be fixed?

Kind regards,
Ashley

From: ICANN Accounting [<mailto:accounting@icann.org>]
Sent: 18 May 2015 19:17
To: Billing
Subject: RE: March 2015 Quarter Invoice

Dear Ashley,

Invoices were sent manually and it was a human error. We sent invoices to Ashley Roberts email because for some reason the email updates made last quarter were not saved in our system. We took her email out from our email list to avoid confusions in the future. We will send all your invoices to [REDACTED] only.

If you want us to send [REDACTED] invoices to Ashley Roberts email, please provide all registries (TLD's and customer numbers) under you and contact email for each registry

ATTACHMENT 4

Kind Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Thursday, May 14, 2015 6:33 AM

To: ICANN Accounting

Subject: RE: March 2015 Quarter Invoice

Hi [REDACTED],

Thanks for your email. Can you please confirm exactly what you mean? If you removed the Ashley Roberts email from the [REDACTED] invoice list then that is great, but it still needs to remain on the general invoice list so that it can receive invoices for [REDACTED]. Can you please clarify?

Also, do you have an idea when this problem with the billing system will be fixed so that things no longer have to be done manually?

Kind regards,
Ashley

From: ICANN Accounting [<mailto:accounting@icann.org>]

Sent: 13 May 2015 17:54

To: Billing

Subject: RE: March 2015 Quarter Invoice

Dear Dietmar,

We took out Ashley Roberts email from our invoice email list.

Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

From: Billing [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Wednesday, May 13, 2015 12:46 AM

ATTACHMENT 4

To: ICANN Accounting

Subject: RE: March 2015 Quarter Invoice

Hi [REDACTED],

Thank you for this. Please can you make sure that you do not send these emails to [REDACTED] as this is a different client and they should NOT be seeing the bills for [REDACTED].

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

www.valideus.com

CONFIRMATION OF INSTRUCTIONS: Please note that we always confirm receipt of instructions sent by email or fax. If you have sent us an instruction and have not received confirmation on the same working day (UK time) it is possible that your instruction has not been received or has been trapped by our spam filter. In this case, please contact your client manager or [REDACTED] for confirmation that the order has been received and is being processed. Thank you.

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[REDACTED]

From: ICANN Accounting [<mailto:accounting@icann.org>]

Sent: 12 May 2015 23:09

To: [REDACTED]; [REDACTED]

Subject: March 2015 Quarter Invoice

Dear Registry,

Attached is your 2015 March quarter invoice. Please contact accounting@icann.org if you have any questions.

Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300

ATTACHMENT 4

Los Angeles, CA 90094-2536 USA

ATTACHMENT 5

From: [REDACTED]
To: [Ashley Roberts](#); [Dietmar Lenden](#)
Subject: Re: List of TLDs
Date: 09 September 2015 17:50:39

Thank you very much for forwarding, Ashley.
Much appreciated.

I will follow up should we have additional questions.

[REDACTED]
[REDACTED]
Internet Corporation of Assigned Names and Numbers (ICANN)
Direct Line: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]
www.icann.org

From: Ashley Roberts <[REDACTED]>
Date: Wednesday, September 9, 2015 at 4:03 AM
To: [REDACTED], Dietmar Lenden
<[REDACTED]>
Subject: RE: List of TLDs

Hi [REDACTED],

Thanks for getting in contact with us about this. I have put two lists below: one shows the TLDs which are already delegated and for which Valideus should be the billing contact; the other one also lists TLDs for which Valideus should be the billing contact, but which are not yet delegated (and therefore not incurring any charges yet).

ICANN should already have this information through the GDD portal, but please update your records if necessary.

Thanks!
Ashley

Delegated

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Not Delegated

ATTACHMENT 5

[REDACTED]

Ashley Roberts
Senior Manager | Valideus Ltd

E: [REDACTED]
D: [REDACTED]

From: [REDACTED]
Sent: 04 September 2015 01:46
To: Dietmar Lenden [REDACTED]; Ashley Roberts
<[REDACTED]>
Subject: List of TLDs

Hi Dietmar and Ashley,

I hope this email finds you well. I'm following up regarding the list of TLDs Valideus manages, but more specifically, the TLDs which should have invoices sent to Valideus.

I believe [REDACTED] is the only one which should not, however if you could please provide a full list, I can then forward that to Finance.

Please let me know if you have any questions.
Thanks in advance for your assistance.

[REDACTED]

Internet Corporation of Assigned Names and Numbers (ICANN)

Direct Line: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

www.icann.org

ATTACHMENT 6

From: [Billing](#)
To: [REDACTED]
Cc: [Dietmar Lenden](#) ([REDACTED])
Subject: RE: September 2015 Quarter Invoice
Date: 12 November 2015 15:19:20
Attachments: [RE List of TLDs.msg](#)

[REDACTED], [REDACTED],

Following on from Dietmar's email, I have just discovered that we have received [REDACTED] latest invoice for their ICANN fees, but we received only a mailed copy instead of an electronic copy, despite us requesting that all invoices be sent by email (see the attached email, plus the billing details we input to the GDD portal). It appears the invoice has been with us for up to a week but I have only just been informed due to miscommunication with our finance team. This is exactly the type of situation we have wanted to avoid, which is why we asked for all invoices to be sent by email.

This billing situation is getting beyond frustrating. A majority of the invoices we have received over the past 12 months have had some kind of problem; either sent late, sent to the wrong contact, by the wrong method, or not sent at all. We have sent multiple emails about these problems as well as having multiple meeting with various ICANN staff. We are sympathetic to the fact that you are having problems with your billing system, but over 12 months we have not really seen much of an improvement in the situation. Can you please let us know how this can be improved so that we can be confident of receiving all invoices by email?

Kind regards,
Ashley

From: Billing [mailto:[REDACTED]]
Sent: 10 November 2015 11:04
To: 'ICANN Accounting' <accounting@icann.org>; [REDACTED]
Cc: [REDACTED]
Subject: RE: September 2015 Quarter Invoice

Hi team,

Thank you for the quarterly bills BUT we are missing the quarterly bill for [REDACTED] – it was not part of the invoice group sent around by ICANN finance. Can you please send this ASAP so we can pay it (we have paid the other [REDACTED] invoices already).

Kind regards,

Dietmar Lenden
Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

ATTACHMENT 6

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[REDACTED]

From: ICANN Accounting [<mailto:accounting@icann.org>]

Sent: 06 November 2015 18:09

To: [REDACTED]

Subject: September 2015 Quarter Invoice

Dear Registry Operator,

Attached is your 2015 September quarter invoice. Please contact accounting@icann.org if you have any questions.

Regards,

[REDACTED]

Finance Department

ICANN

12025 Waterfront Dr. Ste 300

Los Angeles, CA 90094-2536 USA

ATTACHMENT 7

From: [Ashley Roberts](#)
To: [REDACTED]; [REDACTED]
Subject: FW: December 2015 Quarter Invoice
Date: 02 February 2016 17:10:50
Attachments: [REDACTED] [2015 December Quarter Invoice.pdf](#)

Dear [REDACTED] and [REDACTED],

I hope you are both well. We have received a couple of invoices today from ICANN for the latest quarterly fees. There have been noticeable improvements in the process; the invoices came by email, were generally on time, and did not have any errors in the invoices themselves, so thank you for helping to improve things. However, the attached invoice, addressed for [REDACTED], was incorrectly emailed to the primary contact for [REDACTED] (as well as the correct billing contact), as was the invoice for [REDACTED]. I understand this is probably a manual error due to there being no automation in ICANN's billing system at the moment, but when we continue to see the same manual errors occurring time and again it does raise concerns.

Can you please look into why these errors are continuing to occur and try to fix them? I'm happy to meet with either of you in Marrakech if that would be of any help.

Thanks,
Ashley

Ashley Roberts
Senior Manager | Valideus Ltd
E: [REDACTED]
D: [REDACTED]

From: ICANN Accounting [<mailto:accounting@icann.org>]
Sent: 01 February 2016 23:22
To: [REDACTED]; [REDACTED]
Subject: December 2015 Quarter Invoice

Dear Registry Operator,

Attached is your 2015 December quarter invoice. Please contact accounting@icann.org if you have any questions.

Regards,

Finance Department
ICANN
12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

ATTACHMENT 8

From: [Dietmar Lenden](#)
To: [ICANN Accounting](#)
Cc: [Billing](#)
Subject: RE: [REDACTED] missing invoices
Date: 09 May 2016 08:17:17

Hi [REDACTED],

Thank you for these but I'm still missing [REDACTED] invoice.

Dietmar Lenden
Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]
[REDACTED]

E: [\[REDACTED\]](#)
D: [REDACTED]

From: ICANN Accounting [mailto:accounting@icann.org]
Sent: 06 May 2016 17:33
To: Dietmar Lenden [REDACTED]
Cc: Billing [REDACTED]
Subject: RE: [REDACTED] missing invoices

Greetings Dietmar,

Attached are the invoices that you requested.

All the best,

[REDACTED]
Finance Department
Consultant
ICANN
12025 Waterfront Dr. Ste 300
Los Angeles, CA 90094-2536 USA

One World. One Internet.



From: Dietmar Lenden [mailto:[REDACTED]]
Sent: Friday, May 06, 2016 1:52 AM
To: ICANN Accounting <accounting@icann.org>
Cc: Billing <[REDACTED]>
Subject: [REDACTED] missing invoices

ATTACHMENT 8

Hi,

We are currently missing the following Quarter 1 invoices for [REDACTED] and [REDACTED] - they have not come through via email or post. Can you please resend these invoices?

Dietmar Lenden

Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

E: [REDACTED]
D: [REDACTED]
T: [REDACTED]
F: [REDACTED]

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[REDACTED]

ATTACHMENT 9

From: ICANN Accounting
To: Info
Subject: RE: [Ext] RE: First Notice - Past Due Fees to ICANN, [REDACTED]
Date: 16 June 2017 18:55:52
Attachments: image001.png

Hello Ashley,

I didn't mean to imply that no email was provided by the registry operator, but that accounting did not have a billing contact email at the time the notice was sent. The GDD portal will soon push information to our accounting system automatically which should avoid these discrepancies once that implementation is complete. That is part of why the accounting system was updated late last year. Unfortunately, it seems not all of the email addresses migrated properly into the new system when it was implemented, hence accounting not having a billing email contact. I've updated our records with the information below so this can be used in the future for invoicing and any past-due notices. Thank you for providing it. Please let us know if there is anything else we can do for you. Thank you.

[REDACTED]
Billing, Accounts Receivable and Collections Specialist

Main: [REDACTED]
Direct: [REDACTED]

From: Info [mailto:[REDACTED]]
Sent: Friday, June 16, 2017 1:36 AM
To: ICANN Accounting <accounting@icann.org>
Subject: RE: [Ext] RE: First Notice - Past Due Fees to ICANN, [REDACTED]

Hi [REDACTED],

Thanks for your email. It is demonstrably untrue to say that a billing contact email has not been provided to ICANN. The billing contact details were provided to ICANN over two years ago through the GDD portal, where they are still currently stored (please see the screenshot below, taken this morning). May I ask where ICANN accounting obtains the billing contact details from? I thought the entire purpose of us providing the billing contact details in the GDD portal was so ICANN could use them for issuing invoices and billing-related enquiries, but this apparently isn't happening. Can you please explain why ICANN are not using the billing contact details which are stored in the GDD portal?

Thanks,
Ashley

Billing/Financial
Primary Contact

Valideus Ltd 2nd

Mobile Phone

From: ICANN Accounting [mailto:accounting@icann.org]
Sent: 15 June 2017 23:15
To: Info <[REDACTED]>
Subject: RE: [Ext] RE: First Notice - Past Due Fees to ICANN, [REDACTED]

Hello,

This is because a billing contact email has not been provided and the only contact listed on the [REDACTED] website is the abuse email. Please send a request via the GDD portal to update your billing contact email and we will be able to add that to our system. Please let us know if you need anything else. Thank you.

[REDACTED]
Billing, Accounts Receivable and Collections Specialist

Main: [REDACTED]
Direct: [REDACTED]

From: Info [mailto:[REDACTED]]
Sent: Thursday, June 15, 2017 1:42 AM
To: ICANN Accounting <accounting@icann.org>
Subject: [Ext] RE: First Notice - Past Due Fees to ICANN, [REDACTED]

Hello,

Can you please explain why this email has been sent to the abuse point of contact and not the billing contact?

Thanks,
Ashley

From: ICANN Accounting [mailto:accounting@icann.org]
Sent: 14 June 2017 17:59
To: [REDACTED]
Subject: First Notice - Past Due Fees to ICANN, [REDACTED]

Dear Registry Operator,

Please reply to this email as a confirmation of receipt of this notice.

Our records show that your company's account with ICANN is past due.

Please find attached the statement of your account. All past due amounts on the statement need to be paid upon receipt of this email.

If you have made a payment that has not been reflected yet in this statement, please send the payment details to accounting@icann.org.

ATTACHMENT 9

Payments should be sent to ICANN per the instructions below. Payment details should be emailed to accounting@icann.org in order to ensure proper application of your payment.

Send checks to:
ICANN
12025 Waterfront Dr. Ste. 300
Los Angeles, CA 90094
USA

Send wire payments to:
Internet Corporation for Assigned Names and Numbers (ICANN)

Please note that the subject of your email regarding payment should include the customer ID of the registry for timely handling of your account.

We look forward to hearing from you so that your account can be brought back to a current status. Please let us know if you require further information.

Thank you for your attention to this matter.

[REDACTED]
Billing/AR Specialist
Main [REDACTED]

ATTACHMENT 10

From: [ICANN Accounting](#)
To: [billing](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: [Ext] RE: First Notice - Past Due Fees to ICANN, [REDACTED]
Date: 19 June 2017 18:42:51

Hello Dietmar,

Thank you for providing this information. Our bank deducted a fee of \$35 for each payment. Normally we will process the adjustments on our end so that your invoices show paid in full but due to a transfer to new system it didn't get done at the time. Please note we are processing the adjustments for these fees now.

We did not have a billing e-mail address on file for [REDACTED] and [REDACTED] at the time these notices went out. As of today [REDACTED] shows an e-mail address of [REDACTED] but [REDACTED] still shows no e-mail address. Please update/confirm the e-mail address for [REDACTED] via the GDD portal.

Thank you,

[REDACTED]
Billing/AR Specialist

From: billing [mailto:[REDACTED]]
Sent: Wednesday, June 14, 2017 2:12 AM
To: ICANN Accounting <accounting@icann.org>
Cc: [REDACTED]
Subject: [Ext] RE: First Notice - Past Due Fees to ICANN, [REDACTED]

Hi [REDACTED],

Thank you for the first notices for our clients – we received them late last night.

We are a little concerned and perplexed here as we have been paying the same amount the exact same way for the last 2 years and never had this issue. Please find attached the proof from our accounts team that we paid the full amount (as per normal) ahead of schedule and covered all charges at the time. Can you confirm why all the accounts are short \$35 USD exactly. Has something changed at ICANN's side that we need to be aware of? Why is this only affecting March's bills? Is there definitely an error? Can you please provide a breakdown of what happened to result in the accounts all being short \$35 USD.

I would also like to point out that for some reason [REDACTED] and [REDACTED] received their notifications from you at the ABUSE address and not the billing email address.

I look forward to your response.

Dietmar Lenden
Client Project Manager and Validation Services Team Lead | Valideus Ltd

[REDACTED]

ATTACHMENT 10

E:
D:
T:
F:

www.valideus.com[\[valideus.com\]](http://valideus.com)

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From: ICANN Accounting [\[mailto:accounting@icann.org\]](mailto:accounting@icann.org)

Sent: 13 June 2017 23:45

To:

Subject: First Notice – Past Due Fees to ICANN,

Dear Registry Operator,

Please reply to this email as a confirmation of receipt of this notice.

Our records show that your company's account with ICANN is past due.

Please find attached the statement of your account. All past due amounts on the statement need to be paid upon receipt of this email.

If you have made a payment that has not been reflected yet in this statement, please send the payment details to accounting@icann.org.

Payments should be sent to ICANN per the instructions below. Payment details should be emailed to accounting@icann.org in order to ensure proper application of your payment.

Send checks to:

ICANN

Numbers (ICANN)

12025 Waterfront Dr. Ste. 300

Los Angeles, CA 90094

USA

Send wire payments to:

Internet Corporation for Assigned Names and

Please note that the subject of your email regarding payment should include the customer ID of the registry for timely handling of your account.

We look forward to hearing from you so that your account can be brought back to a current status. Please let us know if you require further information.

ATTACHMENT 10

Thank you for your attention to this matter.

[REDACTED]

Billing/AR Specialist

Main: [REDACTED]