Manasa Sundarraman

From:	Manasa Sundarraman
Sent:	Friday, March 12, 2021 5:00 PM
То:	Mohana Nijhawan; Pooja Mahajan; Gaurav Arora; Prashant Mehta
Cc:	Anuradha Agnihotri
Subject:	Service of Pleadings and Written Submissions in C.P. No. (IB) 409(PB)/2017

Dear Sirs,

We refer to the hearing today and request you to kindly serve upon our client (ICANN) the pleadings and written submissions filed by you / your client in CA No. 1140 and 2019 and CA No. 1756 of 2019 and IA No. 4012 of 2020.

We request you to kindly do this latest by 6pm today.

Yours faithfully, Trilegal

Trilegal Prestige Poseidon

139, Residency Road Bangalore – 560 025

 Mob
 Contact Information Redacted

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 +91 80 4343 4646

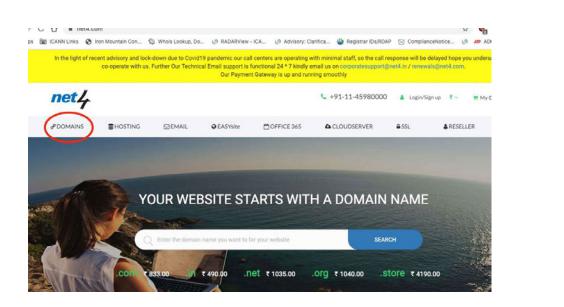
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 +91 80 4343 4665

 F
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BEFORE THE NATIONAL COMPANY LAW TRIBUNAL, NEW DELHI BENCH I.A. NO. 5761 OF 2020

3

IN

COMPANY PETITION (IB) NO. ND.409 (PB) / 2017

IN THE MATTER OF:

Vikram Bajaj (Resolution Professional of Net 4 India Limited)	Applicant	
Versus		
Internet Corporation for Assigned Names and Numbers & Others	Respondents	

IN

Edelweiss Asset Reconstruction Co. Ltd

Versus

... Financial Creditor

...Corporate Debtor

Net 4 India Limited

PRELIMINARY SUBMISSIONS OF RESPONDENT NO. 1 IN APPLICATION UNDER SECTION 14 READ WITH SECTIONS 20, 25, AND 60(5) OF THE INSOLVENCY AND BANKRUPTCY CODE, 2016

Respondent No. 1 to the Application (i.e., Internet Corporation for Assigned Names and Numbers or **ICANN**) above named respectfully submits as follows:

- These Written Submissions (Submissions) are being filed by ICANN pursuant to the directions passed by this Hon'ble Tribunal on 22 January 2021 in relation to IA No. 5761 of 2020 in CP (IB) NO. ND.409 (PB) of 2017 i.e., filed by the Applicant, Mr. Vikram Bajaj (Application), being the Resolution Professional of Net 4 India Limited (Corporate Debtor) under Section 14 read with Sections 20, 25, and 60(5) of the Insolvency and Bankruptcy Code, 2016.
- 2. At the outset, ICANN submits that these Submissions as well as its appearance before this Hon'ble Tribunal as well as any oral and written submissions are without prejudice to its objection to the jurisdiction of this Hon'ble Tribunal, as set out in greater detail below.

3. These Submissions ought to be treated as a limited, preliminary written submissions filed in the interest of assisting this Hon'ble Tribunal with regard to the breaches committed by the Corporate Debtor of the Registrar Accreditation Agreement (**RAA**) entered into between ICANN and the Corporate Debtor. It is not intended to be a comprehensive reply to the Application. The Submissions do not address all aspects raised in the Application, especially since ICANN is not privy to the facts raised therein. These Submissions also do not address any other proceedings in the underlying insolvency proceedings initiated by Edelweiss Asset Reconstruction Company Limited against the Corporate Debtor. ICANN reserves its right to file a detailed response to the Application, if required and if, so called upon by this Hon'ble Tribunal.

PRELIMINARY OBJECTION AS TO JURISDICTION

- 4. At the outset, ICANN clarifies that this Hon'ble Tribunal does not have jurisdiction in relation to it and/or the questions pertaining to the RAA which too, is governed by the Californian law. ICANN respectfully submits that it does not submit to the jurisdiction of Indian courts and tribunals, being a foreign entity (incorporated in and with its principal place of business in California, USA). ICANN is not registered to do business in India. It does not own any property or bank accounts within the territorial jurisdiction of this Hon'ble Tribunal or in India. ICANN does not have an agent for service of process, a mailbox or a registered address within the territorial jurisdiction of this Hon'ble Tribunal or in India. Hence, the provisions of Indian law are not applicable to ICANN and it is not subject to the jurisdiction of Indian courts or tribunals.
- 5. Moreover, as abovementioned, the commercial relationship between the Corporate Debtor and ICANN is governed by the RAA. The RAA contains a jurisdictional clause: Clause 5.8 of the RAA vests jurisdiction exclusively with the courts at Los Angeles, California, USA, in relation to any disputes that arise in connection with the RAA. Consequently, all issues arising under the RAA including ICANN's right to terminate the RAA may be adjudicated exclusively by the courts at Los Angeles, California, USA. It is respectfully submitted that this Hon'ble Tribunal has no jurisdiction in respect of the same.
- 6. It is clarified that ICANN's presence before this Hon'ble Tribunal (including these Submissions) is without prejudice to the foregoing submissions. ICANN's appearance

and these Submissions are made in good faith and with a view to assist the Hon'ble Tribunal. ICANN is not submitting to the jurisdiction of this Hon'ble Tribunal and the present proceedings cannot be considered to be binding on ICANN.

DESCRIPTION OF THE KEY STAKEHOLDERS

- 7. ICANN is a California-based non-profit, public benefit corporation incorporated and existing under the laws of California, USA. ICANN is engaged in the business of coordination of the global Internet systems of unique identifiers and ensuring the stability and secure operation of the Internet's unique identifier systems, including but not limited to the Domain Name System (**DNS**) and Internet Protocol (**IP**) addresses. ICANN does not offer any products or services for sale.
- 8. To assist in its functions, ICANN accredits and/or contracts with 'registries' and 'registrars' across the world, which are critical to a stable, secure, and unified global Internet. They key actors are as follows:
 - a. **Registries / Registry Operators:** 'Registries' are organizations that operate generic top-level domains (g**TLDs**), such as ".com" and ".org" and are responsible for managing the definitive list / database of domain names registered within the gTLDs that they operate.
 - b. Registrars: 'Registrars' are companies accredited by ICANN that are responsible for processing and transferring the registration of domain names. Registrars provide services allowing consumers, businesses and organizations to obtain the right to use and operate individual domain names within a particular gTLD – referred to as domain name registrations. Simply put, one of the functions of a Registrar is to facilitate the registration and use of a domain name to consumers / end users. The Corporate Debtor is a Registrar.
 - c. **Registrants**: Registrants or 'domain name registrants' or 'Registered Name Holders' are the end consumers, businesses and organizations (non-profits, educational institutions etc.) that register and operate individual domain names, with the assistance of Registrars. They are the Registrar's customers. In order to register a domain name in a gTLD (and become a registered name holder), Registrants approach an ICANN-accredited Registrar. Registrars collect

information about the Registrants (such as identifying information, billing information, server address) as a part of the registration process.

- 9. ICANN does not contract with Registrants in any way. ICANN contracts with Registries and Registrars and these contracts contain certain provisions aimed at ensuring that Registries and Registrars comply with a core set of standards that provide Registrants with certain levels of protection, including access to and control over their domain names and access to certain information about registered domain names. Thus, in many ways, the Corporate Debtor's compliance with the contractual terms of the RAA is a matter of public interest.
- ICANN first entered into an RAA with the Corporate Debtor in 2006 and the latest renewal of the RAA was entered into on 14 October 2019. The RAA sets out the various obligations of both parties.

OBLIGATIONS UNDER THE RAA

- By way of the RAA, ICANN accredited the Corporate Debtor as a Registrar. In turn, the RAA required the Corporate Debtor to discharge various obligations.
- 12. Illustratively, they are as follows:
 - i. Submission of Registered Name Holder data to the Registry (Section 3.2, RAA)
 - Provision of public access to data on Registered Names, through an interactive web page and a port 43 Whois service (explained further in paragraph 16 a. below) (Section 3.3.1, RAA)
 - iii. Collection and retention of data in relation Registered Name Holders and Registration (*Section 3.4.3, RAA*)
 - iv. Timely respond to and address Registrants' requests to transfer or renew registrations (Section 4.1, RAA (in relation to Transfer Policy and Expired Registration Recovery Policy)
 - v. Submission of electronic copy of data to a mutually acceptable escrow agent (*Section 3.6, RAA*)

Payment of accreditation fees to ICANN (Section 3.9, RAA) vi.

BREACHES OF THE RAA AND IMPACT

- 13. The Corporate Debtor has repeatedly and persistently breached several of its obligations under the RAA since 2019. The breaches have become severe in 2020. The breaches by the Corporate Debtor have resulted in thousands of complaints being addressed to ICANN requesting ICANN to step-in and remedy the situation.
- ICANN has communicated with the Corporate Debtor both verbally and in writing 14. hundreds of times over one and a half years, notifying it of its instances of noncompliance with the RAA, explaining what is required to address each issue, as well as providing a deadline to do so. In many instances, the Corporate Debtor did not respond; in other instances, the Corporate Debtor's responses were incomplete and untimely and/or did not resolve the issue. Ultimately, even after extensive time and opportunity to do so, the Corporate Debtor failed to cure numerous breaches of the RAA. Therefore, ICANN was left with no choice but to issue notices to the Corporate Debtor dated 10 December 2020 and 24 December 2020, formally notifying it of its breaches (collectively, Notices of Breach). The same are annexed as Annexure A and Annexure B respectively. There are an additional twenty (20) noncompliance issues that the Corporate Debtor has delayed in resolving, even after multiple communications from ICANN, that are likely to soon trigger a third Notice of Breach from ICANN to the Corporate Debtor.
- Through the two Notices of Breach (so far) and numerous prior communications between 15. ICANN and the Corporate Debtor, ICANN notified the Corporate Debtor of its breaches, the adverse impact of the same on the public, the Corporate Debtor's customers and ICANN, and provided the Corporate Debtor with ample time to cure the breaches. ICANN informed the Corporate Debtor that it would be required to terminate the RAA if the Corporate Debtor failed to cure the breaches. The first Notice of Breach was issued on 10 December and gave the Corporate Debtor until 31 December to cure the breaches referenced therein. The second Notice of Breach was issued on 24 December 2020 and gave the Corporate Debtor until 14 January 2021 to cure the breaches referenced therein. However, ICANN has no indication that all of these breaches have been cured.
- The Corporate Debtor's breaches of the RAA and its impact upon Registrants, ICANN, 16. as well as the public at large are set out below:

a. Failure to provide interactive webpage and a port 43 Whois service

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- i. Section 3.3.1 of the RAA requires the Corporate Debtor to provide free, public query-based access to the latest data on all active Registered Names that it has registered, through an interactive webpage and a port 43 Whois portal. Essentially, the Corporate Debtor is obliged to provide up-to-date information about the domain names that are registered with the Corporate Debtor through its own Whois server (i.e. whois.net4domains.com). Since October 2020, the Corporate Debtor has failed to provide access to this data through an interactive webpage and a port 43 Whois server service, thereby breaching the RAA.
- ii. On account of this breach (and subsequent failure to remedy the breach), the Corporate Debtor has prevented Registrants, internet users in general, law enforcement authorities, intellectual property owners, and cybersecurity researchers from accessing critical information regarding domain names registered with the Corporate Debtor.
- iii. ICANN issued notices dated 27 October 2020, 1 November 2020, 4 November 2020 and 13 November 2020 to the Corporate Debtor notifying it of this breach, illustrating it with specific examples, and requesting a resolution. On 1 November 2020, the Corporate Debtor informed ICANN that the issue would be resolved by 2 November 2020.
- iv. On 31 December 2020, the Corporate Debtor asserted that the problem was resolved. The Corporate Debtor provided a link to its website where the option to perform the Whois search is located. However, the query-based search was not operative services on the said link. Further, as supposed evidence, the Corporate Debtor provided screenshots of the search results for a domain that is registered by another registrar - which is completely not relevant to the Corporate Debtor's continued failure to provide up-to-date information about the domain names that are registered with the Corporate Debtor.
- v. Therefore, the fact remains that the Corporate Debtor failed to resolve this issue and cure this breach. As recent as 21 January 2021, the Whois searches of domain names registered with Net 4 India using Net 4 India's web-based Whois service yield no results and only a notation that "No Information found." A document

containing screenshots of the search results showing "No Information found." is annexed as **Annexure C**.

b. <u>Failure to allow transfer of domain names and failure to renew expired</u> registrations.

- Section 3.4.3 of the RAA requires the Corporate Debtor to make registration data available for inspection and copying by ICANN, upon request. The Corporate Debtor has failed to make the registration data available to ICANN despite repeated requests for the same - breaching the RAA.
- ii. The Corporate Debtor has prevented Registrants from transferring their registered domain names from Net 4 to another registrar. It has done so by not providing the 'AuthInfo' Code to Registrants and has kept the status of the Registrants' domain names as 'Client Transfer Prohibited.' Essentially, Registrants are stuck to the Corporate Debtor against their volition - which is a violation of ICANN's Transfer Policy as well as the RAA. Thus, the Corporate Debtor is holding its customers, the Registrants, hostage and is forcing them to avail of its service. At the same time, the Corporate Debtor is not providing the services needed for Registrants to operate their domain names. ICANN has received more than eleven hundred (1100) formal complaints from Registrants in this regard, and more than six hundred (600) such complaints remain unresolved.
- iii. In some instances, the Corporate Debtor seems to have transferred Registrants to other Registrars without the Registrants' consent (as noted in the 10 December 2020 Notice of Breach). Despite enquiries from ICANN, the Corporate Debtor has failed to show that this was done with the consent of the Registrants.
- iv. The Corporate Debtor has failed to renew expired registrations. By not effectively permitting Registrants to renew domain name registrations, the Corporate Debtor is putting Registrants at risk of losing their registered domain names upon which they may have built their businesses, non-profit institutions and/or educational websites.
- v. As on 21 January 2021, the following breaches in this regard remain:

- For the 182 domain names identified in Appendices A-B of the 10 December Notice of Breach: The Corporate Debtor has not provided evidence that the Corporate Debtor has addressed the Registrant transfer and/or renewal requests or that these domain name registrations have been transferred or renewed as requested.
- For the three domain names identified in the 10 December Notice of Breach: The Corporate Debtor has not provided records related to the transfer of the certain domain name(s) from itself to some other Registrar, which allegedly occurred without the Registrants' authorization to do so.
- For the four domain names identified in the 24 December Notice of Breach: The Corporate Debtor has not provided evidence that the Corporate Debtor has addressed the Registrant transfer and/or renewal requests or that these domain name registrations have been transferred or renewed as requested.
- And, as noted below, there are more than 450 additional Registrant complaints that the Corporate Debtor has not addressed.

c. <u>Failure to pay accreditation dues</u>

- i. As a condition of accreditation, the Corporate Debtor, as with all accredited Registrars, is required to pay accreditation fees to ICANN. These fees consist of yearly fees (US\$4,000 per year) and variable fees, which are determined by the transaction type and volume of each Registrar. The Corporate Debtor has either failed to pay or failed to timely pay every invoice issued by ICANN from April 2019 to the present. For those invoices where payment was finally made, such payments were long overdue the delay in payments ranged from 28 days late to 412 days late.
- 17. For example, as of 16 January 2021, the Corporate Debtor owed ICANN US\$7,663.18 in past due fees, which included invoices dating as far back as July 2020, and US\$1,000.00 in current fees. On 20 January 2021, the Corporate Debtor paid US\$3,000.00 toward its past due fees; and on 21 January 2021, the Corporate Debtor paid US\$4,500.00 toward its past due fees, leaving US\$163.18 in overdue fees and US\$1,000 in current fees remaining. Most importantly, there is no indication that the Corporate Debtor has in place some system suggesting that it will not fall behind on future invoices if the RAA is not terminated.

18. To be clear, however, even if the Corporate Debtor was up to date on all fees, ICANN would still be seeking to terminate the RAA due to the Corporate Debtor's other, much more serious, breaches of the RAA that are harming its customers, as described above. A consolidated table detailing the Corporate Debtor's breaches of the RAA and the impact of the same is annexed as Annexure D.

ICANN IS ENTITLED TO AND MUST BE ALLOWED TO TERMINATE THE RAA

- 19. As set out above, ICANN has provided the Corporate Debtor with multiple opportunities to cure the continuing breaches of the RAA. However, several breaches still remain uncured and ICANN is still receiving daily complaints on account of the Corporate Debtor's past and ongoing breaches.
- 20. From the Application and the submissions before this Hon'ble Tribunal, it appears that the Corporate Debtor's breaches cannot be cured by the Resolution Professional directly. Instead, the Resolution Professional is dependent on the former promoters (in particular, Respondent No. 3 and Respondent No. 4) to cure the same. The Resolution Professional has admitted as much in the Application *inter alia* stating that "*since the entire business and revenues of the Corporate Debtor has been diverted to Net 4 Network, the Applicant is not in a position to cure such non-compliances.*" Further to the hearings on 18 January 2021, 20 January 2021 and 22 January 2021, it appears that the Resolution Professional himself is not satisfied with Respondent No. 3 and Respondent No. 4's alleged efforts to rectify the breaches despite several months of negotiation and discussions.
- 21. As of today, there are several breaches of the RAA that have not been cured. Each day these breaches cause and continue to cause grave and irreparable harm to hundreds, if not thousands, of Registrants who have registered their domain names with the Corporate Debtor. As a result, and in addition to, the Corporate Debtor is also harming ICANN.
- 22. Since 1 September 2020 to date, ICANN has received almost 3,000 complaints from Registrants regarding the actions and breaches of the Corporate Debtor. These Registrants and authorized representatives resorted to filing complaints with ICANN after numerous unsuccessful attempts to obtain the Corporate Debtor's assistance in transferring domain names, renewing domain names, updating registration data, managing domain names, and reactivating websites and defunct email addresses, which online businesses and non-profit organizations depend upon. Unlike the Corporate

Debtor's false representations to this Hon'ble Tribunal that the volume of breaches are commonplace for all registrars, nothing can be farther from the truth. At least within the last decade, ICANN has never before received this volume of complaints about a single Registrar in such a short period of time. Moreover, this level of complaints is overwhelming ICANN's Compliance department, is creating a backlog and is detracting ICANN from the other work it must accomplish. As of 22 January 2021, ICANN's Compliance department has received more than eleven hundred (1100) formal complaints made by Registrants regarding the Corporate Debtor, and more than six hundred (600) of these complaints against the Corporate Debtor remain in process and unresolved. It should also be noted that many of the complaints involve numerous domain names, which means that the actual number of affected domain names is much higher than the number of complaints submitted.

- 23. Thus, thousands of domain names, many of which are registered by small business owners, educational institutes, non-profit organisations, are adversely impacted by the Corporate Debtor's breaches. The fall out is especially egregious during the pandemic, when many have shifted their businesses either partially or completely online. Illustrative extracts of complaints received by ICANN from Registrants are annexed as Annexure E, which demonstrate the significant harm suffered by Registrants.
- 24. Due to the Corporate Debtor's repeated and uncured breaches of the RAA, ICANN is unable to fully carry out its responsibility as a non-profit, public benefit corporation. It has a mandate to account for the interests of the public and is being prevented from doing so by the Corporate Debtor's continuing breaches and failure to cure the same. It is not out of place to mention that various media outlets have reported on the Corporate Debtor's breaches leading to Registrants being left with no support and have also raised questions as to ICANN's responsibility in such a situation. Some of these media reports are annexed hereto as **Annexure F** and **Annexure G**.
- 25. In the circumstances, ICANN has no choice but to terminate the RAA. Upon termination of the RAA, ICANN will be able to transfer the domain names registered through the Corporate Debtor to another Registrar, that will effectively and properly serve the Registrants. Termination will allow ICANN to come to the aid of hundreds, if not thousands, of Registrants and fulfil its responsibility in this regard.

- 26. ICANN submits that although the Insolvency and Bankruptcy Code, 2016 (**IBC**) mandates the Resolution Professional to keep the Corporate Debtor as a going concern, the same is not and cannot be at the cost of public interest (including by allowing several other businesses to seriously suffer). In any case, the IBC cannot permit a party continuously breaching a contract to insist that the contract continue for its benefit.
- 27. Further, the termination of the RAA will not affect all the services provided by the Corporate Debtor. Per the Corporate Debtor's own website, the Corporate Debtor provides various services which do not require it to be accredited by the RAA. These include: "Hosting, Email, Easysite, Office 365, Cloudserver, SSL, Reseller"; and providing registrations under country code top-level domains (ccTLDs). These additional services are not regulated by the RAA and an entity does not have to be accredited by ICANN or have an existing RAA to offer these additional services. The RAA is required only for registering domain names under gTLDs. Therefore, it cannot be said that mere termination of the RAA will result in the Corporate Debtor going out of business. In fact, because the Corporate Debtor has significantly struggled in performing its duties as a Registrar, termination of the RAA may allow the Corporate Debtor to focus its efforts on its other lines of business, rather than expending efforts and resources flailing as a Registrar and harming its own customers. A screenshot of the Corporate Debtor's website offering the aforesaid services is annexed as Annexure H
- 28. In any case, the Corporate Debtor's insolvency resolution process started in March 2019. As on date therefore, the insolvency resolution process has continued for over 686 days, well beyond the statutorily prescribed timelines. Even now, the Corporate Debtor appears to be unable to manage compliance of its contractual obligations on its own and is heavily reliant on the former promoter. The prolonged rehabilitation efforts of the Corporate Debtor to fulfil its obligations) have not prevented or remedied the serious breaches of contract or the harm suffered by the public. Moreover, there is no evidence before this Hon'ble Tribunal that the breaches of contract and the harm suffered by the public will end if termination of the RAA is restrained. Therefore, in the present case, there can be no doubt that the termination of the RAA must be permitted.

Summary and Next Steps

- 29. The present Application deserves to be dismissed as against ICANN on grounds that (i) the Hon'ble Tribunal has no jurisdiction over ICANN and/or (ii) there is no case made out for restraining termination of the RAA.
- 30. Without prejudice to the foregoing, should any order be passed regarding continuation of the RAA, it is prayed that the NCLT should also direct the Applicant to ensure the following compliances along with clarifying that in case of failure to adhere to the conditions set out below or rectify the breach, that the orders of the NCLT will no longer operate as a bar against termination:
 - i. Rectification of the Corporate Debtor's failure to provide an interactive webpage and an operable port 43 Whois service within three (3) calendar days;
 - Rectification of all of the Corporate Debtor's failures to provide services that Registrants need in order to: transfer their domain name registrations; renew expired domain name registrations and ensure websites are reactivated upon renewal; and update registration data, within three (3) calendar days;
 - iii. Provide evidence to ICANN within three (3) calendar days that the domain names deesan.com, arhydraulicfittings.com, slkbima.com and arion.asia were transferred from the Corporate Debtor to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), with the authorization of the Registrants and following the requirements of the Transfer Policy;
 - iv. Payment of all past and current accreditation dues within three (3) calendar days;
 - v. Within three (3) calendar days, provide the evidence to ICANN that is specifically described and required in the 10 December 2020 and 24 December 2020 Notices of Breach and related compliance notices, in order to demonstrate compliance; and
 - vi. Continued adherence to the terms of the RAA.

In light of the facts and reasons set out above, it is humbly prayed that the present Application be dismissed and that no orders be passed against ICANN.

aginor.

TRILEGAL

Advocates for Respondent No. 1



10 December 2020

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj Net 4 India Limited (IANA #1007) D-25, Sector 3 Noida, Uttar Pradesh, 201301 India

308, Pearls Business Park Netaji Subhash Place, Pitampura Delhi, 110034 India

Email: bajaj.vikram@gmail.com

Dear Vikram Bajaj:

Please be advised that as of 10 December 2020, Net 4 India Limited ("Net 4 India") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA"). This breach results from:

- Net 4 India's failure to provide an interactive webpage and a port 43 Whois service, also known as Registration Data Directory Service ("RDDS"), providing free public querybased access to up-to-date data concerning all active registered names sponsored by Net 4 India for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA.
- 2. Net 4 India's failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

In addition, Net 4 India has been deemed noncompliant in the following area:

- 1. Net 4 India's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA.
- 2. Net 4 India's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Please refer to the attachment for details regarding these breaches.



By not providing the records and information requested in the compliance cases detailed in the chronologies below, each case comprising a different number of affected domain names, Net 4 India has failed to:

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- 1. Demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provides the Registered Name Holder ("RNH") with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5) calendar days of the RNH's initial request if the registrar does not provide facilities for the RNH to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In addition, with respect to the domain names deesan.com, arhydraulicfittings.com and slkbima.com Net 4 India has failed to provide:
 - a. An explanation addressing the allegations that the domain names were transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), without the knowledge or authorization of the RNHs; and
 - b. Records to demonstrate compliance with Section I.A.3 of the Transfer Policy. Specifically, that through the mandatory Form of Authorization ("FOA"), Net 4 India confirmed the RNHs' intent to transfer each domain name when the relevant notice of pending transfer was received from the registry operator.
- 2. Demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy ("ERRP"), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration ("RAE") must be permitted by the registrar to renew the expired registration. In its responses to the compliance cases, Net 4 India provided the 'Registry Expiry Date' displayed through the relevant Registry's RDDS, also known as Whois service, as evidence that the domain names had been renewed. However, on repeated occasions, ICANN explained to Net 4 India that the 'Registry Expiry Date' is not indicative of an explicit extension of the registration by your registrar's RDDS was operative, indicated the domain name registrations remained expired. ICANN then requested specific evidence of the domain names registration renewals completed by your registrar, Net 4 India did not respond to this request in any of the cases below.

Additional Concerns

Over the past few months, the number of complaints ICANN Contractual Compliance has received from RNHs, and authorized representatives, asserting that Net 4 India is exhibiting a pattern of non-response to domain transfer and renewal requests has steadily increased. While addressing the relevant compliance cases, Net 4 India's responses to ICANN Contractual Compliance have also regularly been untimely and incomplete.



Further, due to unavailability of a registrar Whois/RDDS output by Net 4 India, ICANN is unable to currently confirm Net 4 India's compliance with Whois formatting requirements.

ICANN requests that Net 4 India cure these breaches by 31 December 2020, 21 days from the date of this letter, by taking the following actions:

- 1. Provide an interactive webpage and a port 43 Whois service providing free public querybased access to up-to-date data concerning all active registered names sponsored by Net 4 India for each TLD in which it is accredited.
- 2. To demonstrate compliance with the Transfer Policy:
 - a. For each of the following domain names in Appendix A, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - Evidence that each of the RNHs has been provided with the corresponding AuthInfo code and, where applicable, the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
 - b. For the domain names deesan.com, arhydraulicfittings.com and slkbima.com provide:
 - i. An explanation concerning the circumstances under which the domain names were transferred from Net 4 India to Openprovider.
 - ii. A copy of the FOA Net 4 India sent to the RNHs prior to the domain names' transfer from Net 4 India to Openprovider.
 - iii. Explanation and evidence regarding the method by which the AuthInfo codes were provided to the RNHs, and the dates they were provided.
 - c. For the domain names in Appendix B, provide:
 - i. Confirmation whether Net 4 India Limited has received from the relevant RNHs/RAEs AuthInfo code requests and/or requests to remove the "ClientTransferProhibited" status; and, if confirmed, please provide:
 - ii. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - iii. Evidence that each of the RNHs has been provided with the corresponding AuthInfo code and, where applicable, the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
- 3. To demonstrate compliance with the ERRP:





- a. For each of the following domain names in Appendix B, provide:
 - i. Evidence that the domain names have been renewed (such as a copy of your Registrar's RDDS/Whois output showing the updated "Registrar Registration Expiration Date", or system logs showing a successful renew command sent to the registry operator).
 - ii. Copies of any communications between your registrar and RNHs/RAEs, or authorized representatives, relating to renewal requests.
- 4. Provide ICANN the corrective and preventative action(s) that Net 4 India will take, with implementation date(s), to address:
 - a. Its pattern of incomplete and untimely responses to ICANN Contractual Compliance matters in general.
 - b. Its pattern of untimely responses to RNHs' requests seeking assistance from your registrar prior to, and without the need of, submitting a complaint to ICANN Contractual Compliance.
- 5. Deposit gTLD registration data on a weekly basis to an approved escrow agent and ensure that the deposits meet the required specifications.
- 6. Pay all past and currently due accreditation fees.

If Net 4 India fails to timely cure the breaches and provide the information requested by 31 December 2020, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at leticia.castillo@icann.org.

Sincerely,

,- VH-M-l

Jamie Hedlund Senior Vice President, Contractual Compliance and Consumer Safeguards Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary



ATTACHMENT

Failure to provide an interactive webpage and port 43 Whois service

Section 3.3.1 of the RAA requires registrars to provide an interactive webpage and a port 43 Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by the registrar. Net 4 India's failure to provide these RDDS/Whois services is a breach of Section 3.3.1 of the RAA.

Failure to make registered name holder and registration 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. Net 4 India's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

Failure to escrow gTLD registration data

Section 3.6 of the RAA requires registrars to submit an electronic copy of the data described in Sections 3.4.1.2 through 3.4.1.5 of the RAA to ICANN or, at the registrar's expense, to a reputable escrow agent mutually approved by the registrar and ICANN. Registrars shall submit the data on a schedule, under the terms, and in a format specified by ICANN. Net 4 India's weekly deposits due on 26 November 2020 and 3 December 2020 were not made which is a breach of Section 3.6 of the RAA.

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. Net 4 India owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

APPENDIX A

terraquests.com saralindia.com mysetu.org ai4i4.com ai4machines.com al4Marine.com al4Nav.com ai4processes.com aicompetent.com aifortell.com aistcw.com amarjeetrewari.com amarjeetrewari.net amarjitrewari.com amarjitrewari.net



andthentherewaslight.com appliedresearchinstitute.com appliedresearchinstitute.net appliedresearchinternational.com appliedresearchinternational.net ariebiz.com ariedu.com arieducation.com arimach.com ariprocess.com arisimulation.com arisimulation.net ariworld.com ariworld.net cockpitguru.com dnasimulation.com educationdna.com eneemrana.com firstillusion.com gauravrewari.com gauravrewari.net greenneemrana.com guru4fun.com guru4games.com gurucockpit.com gurucrane.com gurudevice.com gurudollar.com gurudollars.com gurudrive.com guruearn.com gurufastfood.com gurufather.com guruforfun.com guruforgames.com gurumachine.com gurumachines.com gurumove.com gurunewspaper.com gurunuts.com guruoptics.com gurupaint.com gururide.com gurusail.com gurusgod.com gurushoot.com



gurusimulations.com gurusimulator.com gurustay.com gurutrain.com guruvr.com guruwings.com headsandhunters.com in2simulation.com in2simulation.net indianseafarer.com insidesimulation.com insidesimulation.net intosimulation.com intosimulation.net intusimulation.net intwosimulation.com intwosimulation.net iriscrane.com irisdefence.com irisdrilling.com irisdriving.com irismarine.com irisoffshore.com japanneemrana.com marinegurukul.com marinegurukul.net maritimegurukul.com mydreamserver.net myneemrana.com naomirewari.com naomirewari.net natasharewari.com natasharewari.net navigationguru.com navyguru.com neeemranasohos.com neemrana1.com neemranaboulevard.com neemranacentral.com neemranacentralpark.com neemranacountry.com neemranacountryresorts.com neemranacountryside.com neemranaeducation.com neemranaespacia.com neemranaestates.com

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neemranaexotica.com neemranafortview.com neemranagardens.com neemranagardenvillas.com neemranagrand.com neemranaheights.com neemranahomes.com neemranahub.com neemranainstitute.com neemranajapan.com neemranaparadise.com neemranarealestate.com neemranaregal.com neemranaresort.com neemranaresorts.com neemranaroyale.com neemranasoho.com neemranasplendour.com neemranatimes.com neemranatowers.com neemranauniversity.com neemranavillas.com neemranawoods.com nextoceanstrategy.com oceanadmin.com oceanadministrator.com oceanadministrator.net oceandatabase.com oceandatabase.net oceandatabases.com oceandatabases.net oceangov.com oceangov.net oceangovern.com oceangovern.net oceangovernance.com oceangovernance.net oceanguru.com oceanguru.net oceangurukul.com oceannext.com oceansdatabase.com oceansdatabase.net oneneemrana.com ourdreamserver.com rewarifamily.com

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rewarifamily.net sagarmala.com sagarmala.net shippingdna.com shravanrewari.com shravanrewari.net shyamsundersinghrewari.com shyamsundersinghrewari.net simulationdna.com snbone.com thednaofeducation.com thednaofsimulation.com tronicsAi.com virtualcrane.com virtualcrane.net virtualneemrana.com vrneemrana.com weareinneemrana.com weareneemrana.com

APPENDIX B

24

bhombu.com hyglassindia.com medkem.com keralacanoetourism.com prasannalakshmiauditorium.com taxikerala.org gajanand.com gajanandfoods.com dmmetals.com customercarehelpline.com



CHRONOLOGIES

Chronology (00983396):

Date of Notice	Deadline for Response	Details
		ICANN sent 1st compliance notice via email to
		bajaj.vikram@gmail.com, shikha.90712@gmail.com,
27-Oct-2020	3-Nov-2020	pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL
		REDACTED], jasjit.s@net4india.com
		and jasjit.s@net4.com.
1-Nov-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>)
11107 2020	11/7	insufficient to demonstrate compliance.
		ICANN sent follow-up compliance notice via email to
1-Nov-2020	3-Nov-2020	icannresolutions@net4.com and bajaj.vikram@gmail.com.
		No response received from Registrar.
		ICANN sent 2nd compliance notice via email to
4 Nov 0000	44 Nov 0000	bajaj.vikram@gmail.com, shikha.90712@gmail.com,
4-Nov-2020	11-Nov-2020	pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL
		REDACTED], jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar. ICANN called Compliance Contact at +91 01145789408 and
10-Nov-2020	N/A	at [TELEPHONE REDACTED]. No ability to provide the
10-1100-2020	IN/75	Registrar with the complaint details or to leave a voicemail.
		ICANN sent 3rd compliance notice via email to
		bajaj.vikram@gmail.com, shikha.90712@gmail.com,
13-Nov-2020	20-Nov-2020	pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL
10 1101 2020	201101 2020	REDACTED], jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
		ICANN called Compliance Contact at +91 01145789408 and
18-Nov-2020	N/A	at [TELEPHONE REDACTED]. No ability to provide the
		Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other
9-Dec-2020	IN/A	areas of noncompliance.
		To date, the Registrar has not responded to ICANN with the
10-Dec-2020	N/A	requested information and documentation and the issue
		remains unresolved.

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Chronology (00986617):

Date of Notice	Deadline for Response	Details
14-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
19-Nov-2020	26-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Dec-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
8-Dec-2020	8-Dec-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.



Chronology (00986008):

Date of Notice	Deadline for Response	Details
11-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00979893):

Date of Notice	Deadline for Response	Details
9-Oct-2020	16-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.



Date of Notice	Deadline for Response	Details
20-Oct-2020	27-Oct-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
14-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00977571):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

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Date of Notice	Deadline for Response	Details
30-Nov-2020	7-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00971966):

Date of Notice	Deadline for Response	Details
31-Aug-2020	7-Sep-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> and <u>shikha.90712@gmail.com</u>
2-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.
3-Sep-2020	N/A	ICANN re-sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
3-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) insufficient to demonstrate compliance.
17-Sep-2020	24-Sep-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

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Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00972641):

Date of Notice	Deadline for Response	Details
3-Sep-2020	10-Sep-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> .
4-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Sep-2020	1-Oct-2020	ICANN sent 2 nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , [EMAIL REDACTED], <u>shikha.90712@gmail.com</u> , jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent a follow-up compliance notice to via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com, pankaj.s@net4.com and jasjit.s@net4.com. No response received from Registrar.



Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00976977):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to <u>icannresolutions@net4.com</u> , <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> .
30-Sep-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to <u>bajaj.vikram@gmail.com</u> , [EMAIL REDACTED], <u>shikha.90712@gmail.com</u> and <u>icannresolutions@net4.com</u> . No response received from Registrar.
18-Oct-2020	26-Oct-2020	ICANN sent 2 nd compliance notice to via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>icannresolutions@net4.com</u> and [EMAIL REDACTED]. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.



Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00978716):

Date of Notice	Deadline for Response	Details
5-Oct-2020	12-Oct-2020	ICANN sent 1st compliance notice via email to icannresolutions@net4.com, bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.
19-Oct-2020	26-Oct-2020	ICANN sent 2nd compliance notice via email to icannresolutions@net4.com, bajaj.vikram@gmail.com, shikha.90712@gmail.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00975973):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED], <u>icannresolutions@net4.com</u> .
22-Sep-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], <u>icannresolutions@net4.com</u> . No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], icannresolutions@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], icannresolutions@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.



Chronology (00976043):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and <u>icannresolutions@net4.com.</u>
22-Sep-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
6-Oct-2020	13-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], <u>icannresolutions@net4.com</u> . No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], icannresolutions@net4.com. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00977573):

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Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], icannresolutions@net4.com. No response received from the Registrar.
6-Oct-2020	13-Oct-2020	ICANN sent 2 nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], icannresolutions@net4.com. No response received from the Registrar.
12-Oct-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
14-Oct-2020	N/A	Email indicating the compliance case had been closed was mistakenly sent to <u>bajaj.vikram@gmail.com</u>
29-Oct-2020	5-Nov-2020	ICANN sent follow-up compliance notice to <u>bajaj.vikram@gmail.com</u> explaining the error and requesting a full response to the compliance case.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (MDZ-368-16882):



Date of Notice	Deadline for Response	Details
25-Aug-2020	1-Sep-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> . No response received from Registrar. No response received from the Registrar.
2-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from the Registrar.
4-Sep-2020	4-Sep-2020	ICANN re-sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com and [EMAIL REDACTED]. No response received from the Registrar.
4-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
21-Sep-2020	28-Sep-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] and <u>icannresolutions@net4.com</u> . No response received from the Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com. No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

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remains unresolved.

Chronology (NMC-663-14600):

N/A

10-Dec-2020

Date of Notice	Deadline for Response	Details
19-Aug-2020	26-Aug-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> . No response received from Registrar.
28-Aug-2020	4-Sep-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> . No response received from Registrar.
2-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.
4-Sep-2020	4-Sep-2020	ICANN re-sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED].
4-Sep-2020	N/A	Email received from Registrar (<u>bajaj.vikram@gmail.com</u>) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Sep-2020	N/A	ICANN re-sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , jasjit.s@net4india.com, [EMAIL REDACTED], <u>icannresolutions@net4.com</u> with immediate response requested. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED], icannresolutions@net4.com. No response received from the Registrar.

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Date of Notice	Deadline for Response	Details				
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.				
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.				

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24 December 2020

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj Net 4 India Limited (IANA #1007) 308, Pearls Business Park Netaji Subhash Place, Pitampura Delhi, 110034 India

Email: bajaj.vikram@gmail.com

Dear Vikram Bajaj:

Please be advised that as of 24 December 2020, Net 4 India Limited ("Net 4 India") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA"). This breach results from:

1. Net 4 India's failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

Please refer to the attachment for details regarding this breach.

By not providing the records and information requested in the compliance cases detailed in the chronologies below Net 4 India has failed to:

- 1. Demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provides the Registered Name Holder ("RNH") with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5) calendar days of the RNH's initial request if the registrar does not provide facilities for the RNH to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In addition, with respect to the domain name arion.asia Net 4 India has failed to provide:
 - a. An explanation addressing the allegations that the domain name was transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), without the knowledge or authorization of the RNH; and



- b. Records to demonstrate compliance with Section I.A.3 of the Transfer Policy. Specifically, that through the mandatory Form of Authorization ("FOA"), Net 4 India confirmed the RNH's intent to transfer the domain name when the relevant notice of pending transfer was received from the registry operator.
- 2. Demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy ("ERRP"), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration ("RAE") must be permitted by the registrar to renew the expired registration. In the responses that were received in the compliance case, Net 4 India appeared to provide the 'Registry Expiry Date' displayed through the relevant Registry's Registration Data Directory Service ("RDDS"), also known as Whois service, as evidence that the domain name had been renewed. However, ICANN explained to Net 4 India that the 'Registry Expiry Date' is not indicative of an explicit extension of the registration by your registrar and highlighted the 'Registrar Registration Expiration Date' which, while you registrar's RDDS was operative, indicated the domain name registration remained expired. ICANN then requested specific evidence of the domain name registration remewal completed by your registrar, Net 4 India did not respond to this request.

Additional Concerns

Net 4 India Limited continues to exhibit the same pattern of conduct that led to the notice of breach issued against it by ICANN on 10 December 2020, which must be cured by 31 December 2020.

ICANN requests that Net 4 India cure all breaches in this notice by 14 January 2021, 21 days from the date of this letter, by taking the following actions:

- 1. To demonstrate compliance with the Transfer Policy:
 - a. For the domain name bafindia.com, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - ii. Evidence that the RNH has been provided with the AuthInfo code and the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
 - iii. Copies of any communications between your registrar and the RNH, or authorized representative, relating to transfer requests.
 - b. For the domain name arion.asia, provide:
 - i. An explanation concerning the circumstances under which the domain name was transferred from Net 4 India to Openprovider.



ii. A copy of the FOA Net 4 India sent to the RNH prior to the domain name's transfer from Net 4 India to Openprovider.

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- iii. Explanation and evidence regarding the method by which the AuthInfo code was provided to the RNH, and the date(s) it was provided.
- iv. Copies of any communications between your registrar and the RNH, or authorized representative, that occurred between 1 September 2020 and the time the domain name was transferred to Openprovider, including, but not limited to, requests concerning modification of the Whois information, and an explanation of any steps Net 4 India took in response to these communications.
- 2. To demonstrate compliance with the ERRP:
 - a. For the domain names shubhlinegroup.com, provide:
 - i. Evidence that the domain name has been renewed (such as a copy of your Registrar's RDDS/Whois output showing the updated "Registrar Registration Expiration Date", or system logs showing a successful renew command sent to the registry operator).
 - b. For the domain name aurisignum.com, provide:
 - i. Evidence that the RAE has been permitted to renew the domain name registration.
 - ii. Copies of any communications between your registrar and the RNH/RAE, or authorized representative, relating to renewal requests.

If Net 4 India fails to timely cure the breach and provide the information requested by 14 January 2021, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at leticia.castillo@icann.org.

Sincerely,

Juli

Jamie Hedlund Senior Vice President, Contractual Compliance and Consumer Safeguards Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to make registered name holder and registration data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA require registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Net 4 India's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

CHRONOLOGIES

Chronology (00984013):

Date of Notice	Deadline for Response	Details				
30-Oct-2020	6-Nov-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> . No response received from Registrar.				
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.				
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.				
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				



Date of Notice	Deadline for Response	Details					
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.					
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.					
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.					

Chronology (00980845):

Date of Notice	Deadline for Response	Details					
14-Oct-2020	21-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.					
21-Oct-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.					
19-Nov-2020	26-Nov-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.					
4-Dec-2020	11-Dec-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.					
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					

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Date of Notice	Deadline for Response	Details					
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.					
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.					
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.					

Chronology (00977040):

Date of Notice	Deadline for Response	Details					
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com.					
29-Sep-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.					
21-Oct-2020	28-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar					
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.					
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					

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Date of Notice	Deadline for Response	+91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail. ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail. ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar. ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No					
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.					
3-Dec-2020	N/A	+91 01145789408 and left voicemail. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED], <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.					
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.					
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.					
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.					

Chronology (00976900):

Date of Notice	Deadline for Response	Details				
24-Sep-2020	1-Oct-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> . No response received from Registrar.				
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] and jasjit.s@net4india.com. No response received from Registrar.				

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Date of Notice	Deadline for Response	Details				
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.				
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED], and jasjit.s@net4india.com. No response received from Registrar.				
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
24-Dec-2020	N/A	ICANN called Primary Contact Compliance and Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.				
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.				
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.				

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SCREENSHOT OF SEARCHES ON WHOIS PORTAL ON 21 JANUARY 2021

			domains/whois.aspx					
s 🖬 ICA	NN Links 🔇	Iron Mountain Con	Whois Lookup, Do	RADARView - IC.	A 🧭 Advisory: Cla	arifica 🥸 Registrar IDs/RDAP	🛛 🖂 Compliance	INOTICE
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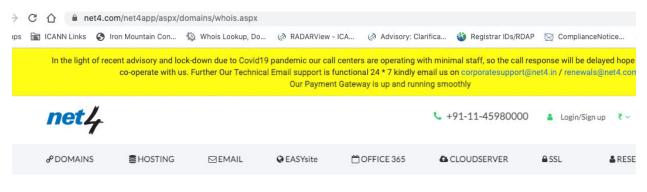
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Annexцђе D

NET 4 INDIA'S BREACHES OF THE RAA WITH ICANN

Sl. No.	Breach by Corporate Debtor	Impact of breach	Remedial Measures (if any)		
1.	BREACH OF SECTION 3.3.1 DUE TO FAILURE TO	D PROVIDE INTERACTIVE WEBPAGE AND A PORT 43 WHOIS SERVICE.	.,		
	Per Section 3.3.1 of the RAA, Net 4 must provide free, public query-based	By failing to cure this breach, Net 4 is preventing Registrants, internet users	None.		
	access to the latest data on all active website names / registered names that it	in general, law enforcement authorities, intellectual property owners, and			
	sponsors. Net 4 is required to provide this through an interactive webpage	cybersecurity researchers from accessing critical information regarding	ICANN conducted Whois		
	and a port 43 Whois portal.	domain names managed by Net 4.	searches of certain		
			domain names registered		
	A 'Whois' portal is one which answers the question "Who is responsible for a	Further, Net 4's failure to provide an interactive webpage and a port 43	with Net 4 India on 21		
	domain name or an IP address?". Whois data contains identifying and contact	Whois service has had an adverse impact on ICANN's ability to process	January 2021, using Net 4		
	information which includes the name, address, email, phone number, and	hundreds of individual complaints made by Registrants. In order to process	India's web-based Whois		
	administrative and technical contacts of Registrants.	the complaints received, ICANN is required to access the relevant data.	service to find that it		
		However, due to Net 4's breaches, it is unable to do so. Hence, the	yields no results – only a		
	Net 4 India has not provided accessibility to registration data for domains	Corporate Debtor's breaches severely hampered ICANN's ability to	notation that "No		
	registered with Net 4 through its Whois service since October 2020.	discharge its functions (carried out in public interest).	Information found."		
2.	BREACH OF SECTION 3.4.3 OF THE RAA DUE TO FAILURE T	E TO DEMONSTRATE COMPLIANCE WITH SECTION I.A.5 OF THE TRANSFER POLICY			
	Section 3.4.3 of the RAA requires Net 4 to make the relevant data (such as commu				
	inter alia demonstrates compliance with the Transfer Policy and the Expired Regi				
	is in breach of the Transfer Policy and the Expired Registration Recovery Policy for	or the reasons set out below. It has failed to demonstrate compliance with these	e policies, thereby breaching		
	Section 3.4.3 of the RAA.				
a.		trate compliance with the Transfer Policy			
	Section I.A. 5 of the Transfer Policy prohibits Net 4 from setting the status of a		None - no evidence		
	website / domain name to 'Client Transfer Prohibited' unless the Customer	registrar, it must obtain its unique 'AuthoInfo Code' from Net 4 and provide	provided.		
	requests that this be done. Further, Section I.A. 5 requires Net 4 to provide	it to the new and preferred registrar. A transfer is not possible without the			
	Registrants with the AuthoInfo Code, upon request. These requirements are	AuthInfo Code. Additionally, Net 4 must not maintain the status of the			
	necessary to enable Registrants to transfer their websites / domain names	domain name as 'Client Transfer Prohibited'. As the name suggests, this			
	from one registry to another.	status will lock the domain name and prevent Registrants from transferring			
		to a new registrar if they wish to.			

Sl. No.	Breach by Corporate Debtor	Impact of breach	Remedial Measures (if any)
	Here, Net 4 has not adhered to these requirements, i.e., it has not provided the AuthInfo Code to Registrants, despite repeated requests. It has also refused to change the status of Registrants' websites / domain names from 'Client Transfer Prohibited' to a status which permits transfers. This is a breach of Section I.A. 5 of the Transfer Policy. Further, Net 4 has transferred certain websites / domain names from Net 4 to Hosting Concepts B.V. d/b/a Registrar.eu, without the relevant Registrants' consent and has asserted that Net 4 India was acting as the reseller when the transfers occurred and as a reseller it "can choose to move their customers to other registrars."	Net 4's breaches in this regard are preventing Registrants, many of whose online businesses and identities depend on their websites / domain names, from transferring their website / domain name from Net 4 to any other registry. Essentially, Net 4 is holding Registrants hostage and is forcing them to avail of its service. At the same time, Net 4 is not providing the services needed for Registrants to operate their domain names. ICANN has received more than 1000 complaints from Registrants in this regard, more than 600 remain unresolved.	
	This is not correct and is in violation of the Transfer Policy. Failure to demonstrate compliance with the Transfer Policy is a breach of Section 3.4.3 of the RAA.		
b.		ance with the Expired Registration Recovery Policy	
	Section 2.2.5 of the Expired Registration Recovery Policy mandates that Net	A Customer may use a website / domain name for the period of time for	None
	4 permit its Registrants to renew any expired registrations of their websites /	which it is registered, which can be from one to ten years. In order to keep	
	domain names. Numerous Registrants have requested Net 4 for a renewal of their	using the website / domain name and any of the services associated with it	
	websites / domain names. However, Net 4 has failed to renew the expired	(like an email service) the Customer must be able to renew the domain name	Registration data for
	registrations. It has also failed to demonstrate compliance with the Expired	registration before it is expired and deleted. By not effectively permitting	many domain names
	Registration Recovery Policy, thereby breaching Section 3.4.3 of the RAA.	Registrants to renew domain name registrations, Net 4 is putting Registrants at risk of losing their websites / domain names upon which they may have	remains to be provided. Net 4 has not provided
		built their businesses, non-profit institutions and/or educational websites.	evidence that the domain
		Needless to say, this is grave and irreparable harm caused to Registrants.	names have been
			renewed.
		ICANN receives complaints regarding unresolved renewal requests to Net	
		4, on a daily basis.	
3.	BREACH OF SECTION 3.9 OF THE	RAA DUE TO FAILURE TO PAY ACCREDITATION FEES	

SI. No.	Breach by Corporate Debtor	Impact of breach	Remedial Measures (if any)
	Section 3.9 requires Net 4 to pay accreditation fees to ICANN as a condition	Failure to pay ICANN the fees due to it impedes ICANN's ability to	Net 4 has paid some of the
	of accreditation. These fees consist of yearly fees (USD 4,000 per year) and	function effectively. ICANN is a not-for-profit organization, operating in	fees due to ICANN, albeit
	variable fees, which are determined by the transaction type and volume of each	public benefit. It charges minimal fees in order to fund its operations, at	in a delayed fashion.
	registrar. Net 4 India, through the resolution professional Mr. Vikram Bajaj, has	cost.	However, as of 22 January
	been provided customer statements and copies of pending invoices on several		2021, Net 4 still owes
	occasions.		US\$4,663.18 in past due
			fees and US\$1,000 in
	Net 4 India has either failed to pay or failed to timely pay every invoice		currently due fees. to
	from April 2019 to the present.		ICANN.
4.		RAA DUE TO FAILURE TO ESCROW REGISTRATION DATA	-
	As per Section 3.6 of the RAA, Net 4 is required to submit certain registration	By failing to escrow the data as required, Net 4 has been putting	Data escrow deposit due
	data to an escrow agent in order to safeguard Registrants. Net 4 has is	Registrants at risk of permanently losing their website / domain name	on 21 January 2021 has
	required to do so on a weekly basis and has not done so regularly. o Net 4	registrations with no chance of recovery.	been made by Net 4 - to be
	India failed to make the mandatory data deposits on 26 November 2020, 3		verified.
	December 2020 and 10 December 2020 – thereby breaching Section 3.6.		
	By storing registration data with a data escrow provider, it is possible to		
	recover website /domain name registrations in the event of registry or registrar		
	failure, accreditation termination, or non-renewal. In fact, data escrows are meant		
	to be of assistance precisely in situations such as the present one, where Net 4 is		
	failing to fulfil its obligations.		

Annexu₅₂e E

BRIEF ILLUSTRATIVE LIST OF THE COMPLAINTS MADE BY REGISTRANTS / CUSTOMERS, AND THEIR AUTHORIZED REPRESENTATIVES, TO ICANN EXPRESS CONCERNS REGARDING NET 4 INDIA.

The following information has been redacted from the quotes below: domain names that are not included in a public Notice of Breach, reporters' contact details, and payment amounts.

- "I am having10 domains in Net 4 India. Not response over mail, phone & amp; ticket, Now I am getting problem to transfer to service provider. Need help."
- "I am struggling to contact Net 4 India on phone and mails. No response from them and +91-11-45980000 is not working. As per internet search, Net 4 India Limited shutdown the offices across India without informing customers and partners which is void of ICANN code of conduct. They are not allowing to renew the domains and not even providing domain Auth-Code so as to prevent domain transfer. ICANN Please help us to list Net 4 India Limited on Bulk Transfer Page."
- "Please help me to transfer more than 40 domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful."
- "I Have more than 150 Domains Under Net4 India some of them are under redemption and some are expired & amp; some are in near expiry. Please ICANN help me to transfer all my domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful."
- "Looks like ICANN continues monitoring Net 4 India Limited till we all will be finished, our all domains get expire. Mr. Jamie Hedlund please wake up and do not let us die. We are suffering every day and day by day situation will be worsen for Net 4 India customers/users. Please take concrete action and do not let ICANN becomes I CANNOT...."

- "I have more than 18 domains with net4. some of them have expired in november and dec not able too renew or transfer them.please help"
- "I am [REDACTED] we having 2 accounts -in Net4-india with 8 + 3 Domain, as Net4 team not responding .. we not able to renewed our some of Domain and -in that 2 Domain also got expired. now there is total 6 + 3 = 9 Domain is there; I logged in to there console for Auth CODE request but that also not happening from many weeks .. we tried .. Need your help in this to get Auth Code of all our Domain -in Net4 so we can transfer it to other DNS provider below is the list we have 2 accounts with you [REDACTED] please help us to get Ath-CODE for all our above DOMAIN asap..."
- "Hello, we are also having problem with Net4 support like renewal, DNS management, whois record... Pls. help us how to solve these issue. Thankyou"
- "We tried contact Net4India but there is no response on phone/email. Please help us...All my domains are down."
- "Tired of contacting Net4. No response anyway. Various tickets opened, emails send which bounced back, no contacts. Renewed my two domains in Sept'20 for 5yrs, payment done but order status yet not updated. Getting afraid whether my domain if not renewed, our company's all emails and hosting services will get stop which will lead to huge business loss. Please help how can I transfer my 3 domain from Net4 to other service provider as not getting any help from net4 in any matter. Thanking you"
- "Hi. I have 15 domains registered on Net4. I am trying to get my contact details updated on Net4 Website. I also tried to generate authorization code but there is no response from Net4. I tried visiting their office, which is closed now. The call center/backend number +91-11-45980000 is also not working. I also wrote to corporatesupport at net4 dot in on 27th October 2020 and there is no response from them till date. Please help as I need the domains to get transferred to another vendor as soon as possible. I tried to update the name server for one domain. The same does not get updated. I had to take a separate domain on another vendor to host my website. When I renewed my website or purchase a new one, I am not even able to get the GST invoice. Neither the same gets updated on the GST Site

against my GST number which is already updated on my Net4 login. I feel so trapped with net4 as I need the domain for my work."

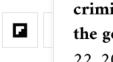
Annexure F

Topics: Bankruptcy, Domain Registration, ICANN, National Internet Exchange of India, Net 4 India

As Net 4 Buckles Under Bankruptcy Proceedings, Customers Left With Nobody To Turn To



By Aroon Deep Published September 17, 2020



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On September 7, Ruchit Kapadia couldn't access his email. He was able to send emails, but not receive them. Kapadia works in Mumbai at his family's garment export company, DKK Exports, and administers the bulk of his business through email. "My business has come to a standstill, because I can't access my email," he lamented. Since all his clients are based abroad, email is the only formal way he has of communicating with them. It's the only way he can send invoices, take orders, and negotiate with buyers.

Upon investigating, he found out that his company's lease over his business's domain, dkkexports.com, had expired on August 13.

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said. But his registrar, that is, the website where he bought the domain name, automatically offered him some more time to make a renewal payment. So he paid. But the renewal never happened.

So Kapadia called up Net 4's customer care number, 011-45980000. He was not able to get through to a real person. So he tried to call up one of their offices. Nobody picked up. He tried Net 4's multiple outposts over the phone — Delhi, Mumbai, Bangalore, Chennai, Pune and Kolkata. Nobody was picking up. In Delhi, the number itself was disconnected, Kapadia said.

f sent some people to the Delhi office to see if he could get in touch with
meone in person. The office was closed. He also sent someone to the Pune fice, but it had apparently been shut for three years.

ustrated, he went on Twitter to voice his complaints. He wasn't the only
 e. Many users on the site have been aghast at the prospect of losing access
 their or their business's online identity. One user tweeted, "When India is working virtually Net4 has disappeared illegally, putting thousands in misery in these hard times. Please let us transfer our domains."

Meanwhile, Naresh Gupta, a Noida-based startup executive at ANR Glocal, and his colleagues couldn't access their email, which had a custom address with the domain name of the company, anrglocal.in. "First, I tried to call the customer care number, but it always came busy. Then I wrote an email to the customer care [corporatesupport@net4.in]. There was no response," he said. Gupta wanted to downgrade his email plan since his inboxes didn't need much storage, but an error prevented him from ending the expired plan, and no company representatives seemed online to take his call.

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initial package can be discontinued. We have been trying to get in touch with their customer support, but the line is always engaged."

To make matters worse, Net 4's website was down briefly. After the site came back up, Gupta was able to move his email to a different service, even as his domain name <u>remained</u> registered with Net 4.

Arjun Shah, an artist manager who runs the firm Shark & Ink in Mumbai, was not able to transfer his domain name (sharkandink.com) to a different

gistrar, complicating things for his business. "Because that transfer didn't ppen, my email server was down. If you don't have email for a week, and

- meone gets an auto-response saying that the domain doesn't exist, people sume the worst, that the company has shut down." Like many other users,
- ah was trying to transfer his domain because he was not able to renew it on st 4.
- \searrow

....ediaNama spoke to over half a dozen users who faced these issues and struggled to get in touch with Net 4. Twitter has seen a growing chorus of helpless domain holders tagging the <u>IT Minister</u>, the <u>Prime Minister</u>, <u>TRAI</u>, or anyone they think could help. Users, especially businesses, have been distraught at the prospect of losing access to their websites and email inboxes.

Who is a domain registrar?

Domain registrars are companies that sell domain names like medianama.com. Many registrars also provide services like website hosting and email. Net 4 is a registrar that did this.

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Net 4 customers are not able to reach any person within the company for support. We tried calling the company, but its phone lines are either disconnected or calls don't connect to any human operator. It is unclear if the company is even operating with skeletal staff. Net 4's website is up, but little else is visible.

⁺let 4's financial troubles

st 4 started life as an internet service provider in 1985 but transformed into a main name registrar around the time internet businesses started cropping
 around the world. At one point, the company was reportedly India's largest gistrar, with over 1 lakh generic Top Level Domains (like .com, .net, etc.)
 der management.

In 2011, it was a seemingly healthy business — profits had <u>increased</u> almost two-fold year over year, and the company had even <u>completed</u> a strategic acquisition. It had revenues well into the hundreds of crores with commensurate profits, and data centres and offices in six cities. It worked with companies like Verizon, British Telecom, DeBeers, and ITC.

But all that growth disappeared — starting in 2002, Net 4 started to borrow money from the State Bank of India and continued to do so over the years. By 2017, it was running losses. This was also around the time the company was associated with a large-scale Twitter hack, where it <u>denied</u> any responsibility.

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Reconstruction.

The company has intermittently been in financial trouble since then. The same year SBI declared Net 4 an NPA, its founder and Managing Director Jasjit Singh Sawhney was <u>arrested</u> as the company did not pay the service tax it had collected from customers. Sawhney is no longer a director at the company and lives in the UK, according to one of his lawyers cited in an NCLT <u>order</u>.

In 2017, Net 4 reported a quarterly loss of Rs 4.22 crore. In the following year,

- was <u>delisted</u> from the National Stock Exchange and the Bombay Stock change. One former employee told MediaNama that the company was
- ruggling to pay employees their wages on time as late as 2019, and that it d completely stopped paying out salaries amid the COVID-19 pandemic,
- th employees largely no longer showing up at work.

It 4's insolvency proceedings started last March, and hearings in the matter ... e ongoing at the National Company Law Tribunal. In one judgement from March 2019, the NCLT appointed Vikram Bajaj, an insolvency expert registered with the Insolvency and Bankruptcy Board of India, as a "Resolution Professional" in the matter. On being contacted by MediaNama, Bajaj refused to comment on the situation.

According to Domain Incite, which first <u>reported</u> the insolvency proceedings in 2019, Net 4 had over 100,000 domain names under management as of February 2019.

A message on Net 4's website warns customers of increased wait times on support calls, but only till August 15. It has been a month since that end date, and customers seem to be facing a company that may as well not exist rather

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Vijayashankar Nagarajarao, a cyberlaw consultant who goes by the name Naavi, said in a <u>blog post</u> in July that ICANN and the Ministry of Electronics and Information Technology needed to step in to make sure customers weren't locked out of their websites. He noted that this kind of situation, where Net 4's customer support went silent and its systems stopped working as intended, already <u>happened</u> once in 2017.

Net 4 did not return our request for comment.

CANN and registrars

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gistrars like Net 4 are accredited by the International Corporation for signed Names and Numbers. Many users are reaching out to ICANN's India head, Samiran Gupta, for help on renewing their Net 4 purchases. According to multiple emails we obtained from customers, ICANN is referring users to file individual complaints:

With regard to Net4India, the company is in a legal dispute with several creditors. The matter was referred for insolvency proceedings at the National Company Law Tribunal in 2019. The tribunal appointed a resolution professional who is coordinating with ICANN on matters related to compliance of ICANN's registrar agreement, including renewals and transfers of domain names. Since you are facing challenges in renewal or transfer of domain names, please use the Transfer Complaint form at

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[Source: ICANN email to customers]

While ICANN coordinates systems internationally for namespaces and domain names, individual domain registries also have to license registrars. For example, the National Internet Exchange of India (NIXI) operates Registry.in, which authorises registrars to sell the .in and .bharat domain names. Last year, .t 4 was <u>listed</u> by NIXI as a "top-performing" registrar. As of writing, the mpany has been <u>moved</u> to the bottom of the "other performers" list.

CANN did not anticipate the problem of a Registrar walking away leaving the stomers in the lurch," Naavi wrote earlier this year. "Now it is the sponsibility of ICANN to sort out this issue. Otherwise, there could be legal tion against the representative of ICANN in India," he warned, referring to upta.

While Domain Incite, which first <u>reported</u> Net 4's insolvency process, reported that Net 4 has been "suspended", we have reached out to ICANN for more information on what exactly is being done to protect users' interests.

It is worth noting that ICANN's master agreement with registrars <u>entitles</u> them to a termination of contract if a registrar has been tangled in insolvency proceedings for more than a month. But they don't seem to have taken advantage of this clause. ICANN also says on its <u>complaints page</u> that it cannot intervene when complaints are made regarding country-specific domain names. We have sent a query to NIXI, which operates the .in registry, to find out if they are taking action on behalf of Net 4 customers.

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individual complaints. Several businesses could be affected in the meanwhile - the company claims to have thousands of businesses signed on, such as Airtel, CNBC TV18, Essar, and TCS. As more of these customers approach expiry dates for their services, the impact could grow.

The situation may remain uncertain until Net 4's financial troubles are cleared up. A so-called resolution plan is pending at the National Company Law Tribunal, whose principal bench said in an order that it would look at the plan only after considering a few more issues. The next hearing, in that case, is set r October 1.

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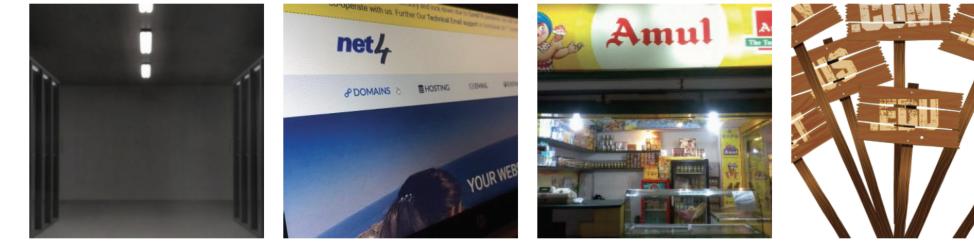
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NIXI Will Not Cancel .IN Domains Issued

Net 4 India Shareholding 'GoDaddy, Other **Domain Registrars** **ICANN Rejects .ORG**

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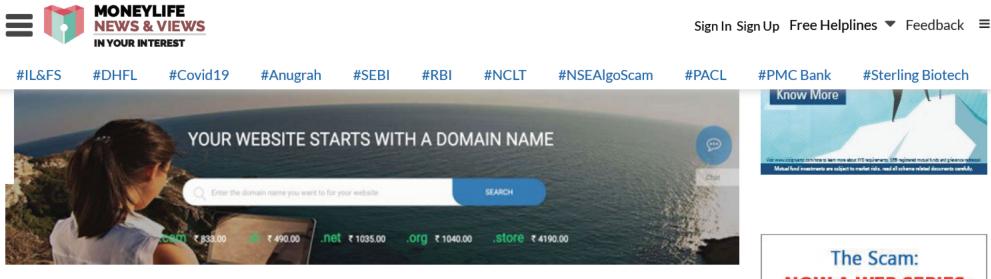
Net4India Remains Incommunicado Leaving Lakhs of Domains and Clients in the Lurch

Moneylife Digital Team 11 December 2020



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UPDATED on 14 December 2020 at 12 30pm to add information on Net4India grievance redressal as shared by Mr Vikram Bajaj, RP for the company

Net4India Ltd, the largest domain registrar in India that is accredited with Internet Corporation for Assigned Names and Numbers (ICANN), has become inaccessible to its clients. Neither queries and emails sent by clients have been evoking any response, nor there is any communication coming out from

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the company. While media reports cite financial difficulties faced by the company, Net4India's abrupt move to go out of reach has left lakhs of domains and its clients for various services in the lurch Some of the domains registered with Net4India include IndianBank.in and AndhraBank.in.





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#PMC Bank #Sterling Biotech

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'azdi Tantra from ON-LYNE says, "We have almost 150 domains registered for our lients through Net4India We are totally stuck as we are not able to renew lomains, a few of which have already expired. We even tried to transfer domains to another registrar but are not getting the authorization code from them."

"We understand that all their offices across India are closed and there is no physical interaction possible. All emails sent to them are not responded to. This is putting us and our clients to lot of trouble, including loss of business and reputation," Mr Tantra, a regular columnist of Moneylife, added.

SAGLASS @SaglassInd

Dear @inregistry Since Net4India has shut down, we have put in a request for an authcode, in order to initiate the transfer for which all documents have been submitted a month back. We'd appreciate if you could let us know the status of our request. Thank you.

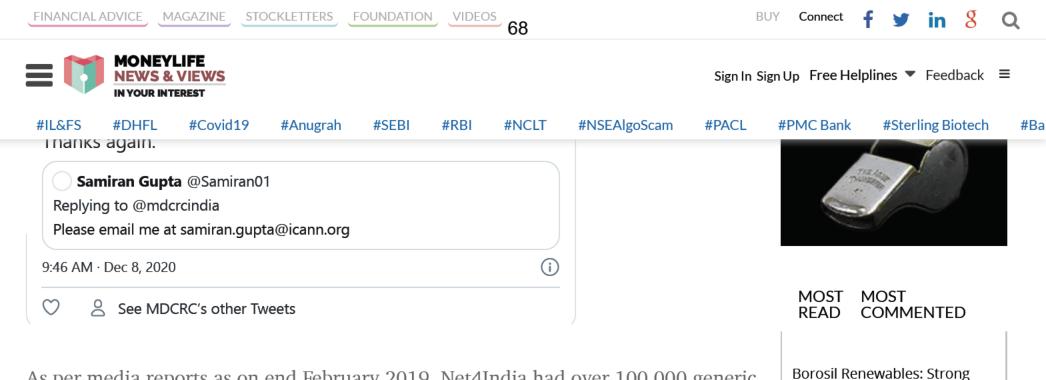
1:02 PM · Dec 1, 2020

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As per media reports as on end February 2019, Net4India had over 100,000 generic top level domains (gTLD) under its management The gTLDs includes almost all .com and other legacy gTLDS.

"The trouble started a few years ago when Net4India took loans and failed to repay, therefore, Edelweiss Asset Reconstruction Company sued Net4India to get its money back in March 2019. Furthermore, in June 2019, ICANN had suspended their ability to create new domains and had initiated inbound transfers. This was done due to the ongoing insolvency proceedings," a report from Foetron says.

There are two issues with Net4India. One is an order passed by the National Company Law Tribunal (NCLT) and subsequent action taken by ICANN. On 8 March 2019, the NCLT bench at New Delhi issued an interim order in the Net4India matter and appointed Vikram Bajaj, as resolution professional This was the MCA Portal Still Remains in 'Apology'...

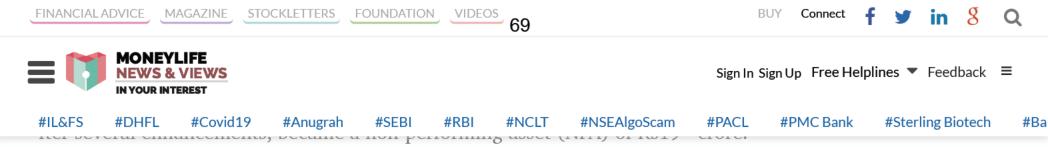
18 Days after the Due Dates,

Growth, but for How Long?

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n 2014, a year later, when the loan turned NPA, SBI sold this debt to Edelweiss.

Iowever, Mr Bajaj, the resolution professional appointed for Net4India denied that Net4India has closed its business. In an email to Moneylife, he says, "...the committee of creditors has already approved a resolution plan involving change of management, which is sub judice before the NCLT and upon approval of resolution plan by the NCLT and implementation of resolution plan the Net4India shall continue as a going concern."

After the NCLT order, ICANN, in June 2019 suspended Ne4India's ability to create new domains and initiated inbound transfers.

ICANN is an international body with responsibility for Internet Protocol (IP), country code (ccTLD) and top level domain management

A report from MediaNama says, the same year SBI declared Net4India as an NPA, its founder and managing director Jasjit Singh Sawhney was arrested as the company did not pay the service tax it had collected from customers Mr Sawhney, however, is no longer a director at the company and lives in the UK, according to one of his lawyers cited in an NCLT order.



On Twitter, many users have complained that no phone call or email is being answered by Net4India. Reports say Net4India is a domain registrar company with around 90,000 website hosting, 1 5 million corporate emails and 3 75 lakh domain registrations. The company's website is also down.

Aiat Institute @aiatinstitute	y
@Net4India	
We are not able to change the NS in our domain, Please	
Update NS in Following Domain	
jobkatta.com	
spardhaclass.com	
jobnagpur.com	
you are not responding on your support : TT-20201201-	
191221	
12/1/2020	
Kindly Update Name server above domain	
3:54 PM · Dec 3, 2020	i



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BUY

Connect

#IL&FS	#DHFL	#Covid19	#Anugrah	#SEBI	#RBI	#NCLT	#NSEAlgoScam	#PACL	#PMC Bank	#Sterling Biotech	#Ba
Net4 cl My Ema domain #Digita	addy Help req osed doo ails & wel n to #goD	ors without bsite are n Oaddy with	information ot working. out getting	l canno							
♡ 2	See Dr	CK Taneja's o	ther Tweets								
	lahrukh Ina)mahrukhina					y					
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11:58 AM	· Sep 22, 202	20				í					
$\bigcirc 8$		hrukh Inavet	's other Tweets								

○ 8 See Mahrukh Inayet's other Tweets

Many of the clients of Net4India had written to the Prime Minister Narendra Modi, the Prime Minister's Office (PMO, the ministry of electronics & information

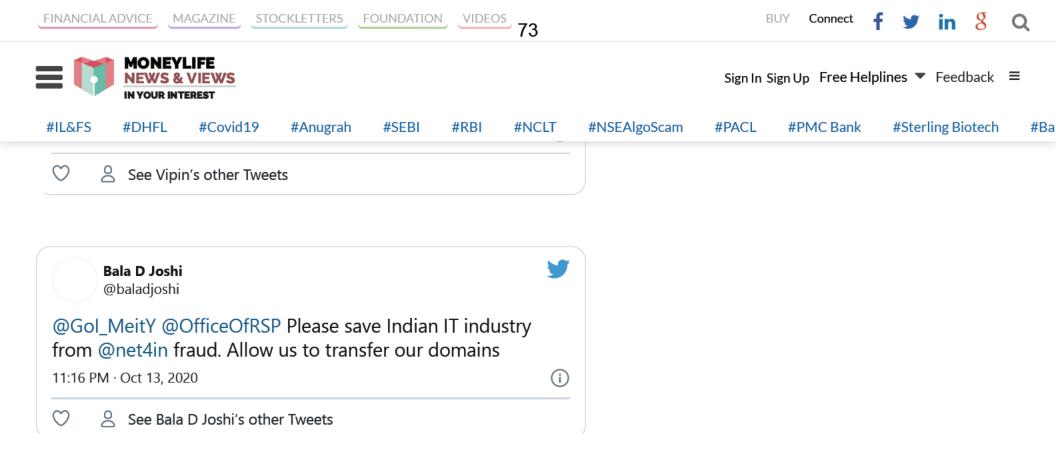
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BUY Connect

#IL&FS	#DHFL	#Covid19	#Anugrah	#SEBI	#RBI	#NCLT	#NSEAlgoScam	#PACL	#PMC Bank	#Sterling Biotech	#Ba
	@Gol_Meit	Bringing att	odi @nsithara ention to clear customers of #	and prese	nt dangei	r to critical					
	NCLT Orde	er on Net4Indi	a rajarao (Naa ia is killing 700 naavi.org/wp/	00 + custo	mers and	l needs					
	Vipin @vipinpv										
	-		ly many of 4in @Naavi		ks are u	sing					



ICANN, on its part, is however, responding to clients of Net4India. However, it has a limited role to play in India ICANN, reportedly says, it is working with the Indian government and the MeitY about transferring responsibility of domains and email registered on Net4India to another Indian company. But so far there is no progress.

On the one hand, there are tremendous efforts by the union government to push India into the digital age, while end-users continue to face serious issues. The Net4India case, however, is very bad for the country's reputation in the information technology (IT) sector and all its clients hope to see some light at the end of the tunnel



uddressed. I am also trying to address exigencies and escalations."

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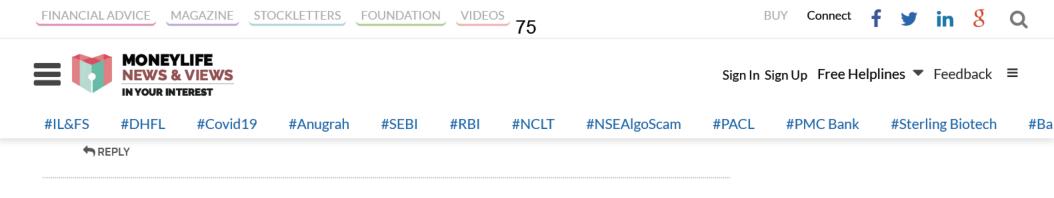


User 🕑

What do you think?... Write your comments

Alert me when a new comment is posted





diaselvis 3 days ago

We need to report this to cybercell as their payment gateway is still operational with Upay. I just paid for renewal and then came across this article. This is a huge scam. The payment gateway on their site must be disabled instantly

REPLY



Dggohil 3w k go

Login into Net4 India cPanel and open this link in other tab where you can change A Records and CNAME

easily,, https //www.net4.com/aspx/domain/DNS aspx

REPLY

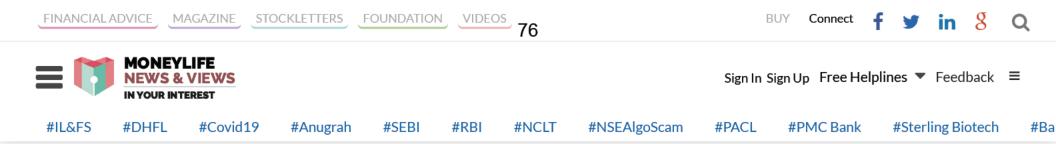


yazdi 1 month ago

https://www.naavi.org/wp/icann-has-to-find-a-solution-to-net4india-problem/

REPLY





oneplus6tsara 1 month ago

The worst part is they are accepting money for new registration. I bought my company domain recently without knowing the story. Now I am not able to do anything. Not able to transfer my domains. I have 6 important domains purchased for 5 years. :-(. They allowed me to renew my domains during Aug2020.

REPLY

Rupesh Chatterjee 1 month ago

In the report it says, the director of net4india has already resigned and now living in the UK

In the past few years, from the examples of Vijay, Nirav, etc, we have seen that when some company directors says they are travelling to UK, they most likely are planning to leave India for good.

How does all these runaways and absconders end up in the same country.

This should stop. UK, which otherwise stands up for humanitarian causes around the world, should not be a safehouse for the most wanted

Bring all these irresponsible directors back and make them accountable



they run out of server capacity? Something seems off

This must really sting for its customers Shucks!

REPLY

Rupesh Chatterjee n Rep y to adityag 1 month ago In the past few years, from the examples of Vijay, Nirav, etc, we have seen that when some company directors takes a flight to UK, they are leaving India for good.

Most of them are abandoning their motherland, with their ill gotten wealth and a new hope of living a luxurious fugitive life in europe under the protection of the newly purchased golden visas.

The credit worthiness of the establishment they owed in India gets completely leveraged to take loans These loans taken with no intention of paying back, gets converted into digital currencies through layering and laundering, also into foreign villas under offshore company ownership to fund their fugitive retirement on the beachside

This should stop UK, which otherwise stands up for humanitarian justice, is now becoming the hide house for law breakers and fugitives. Bring all these irresponsible directors back and make them accountable



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#IL&FS	#DHFL	#Covid19	#Anugrah	#SEBI	#RBI	#NCLT	#NSEAlgoScam	#PACL	#PMC Bank	#Sterling Biotech	#Ba
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Editors' picks

Insurance

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MONEY FEDGTA TEAM



INVESTOR ISSUES

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Annex79e H

SCREENSHOT OF HOME PAGE OF NET4.COM

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& DOMAINS	■HOSTING	EMAIL	@ EASYsite	OFFICE 365		€ SSL	& RESELLER	
			Email/CRN ID Password Reset Password	User Login	LOGIN			Chat
			Not	Registered yet? Sign	up			



29 January 2021

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj Net 4 India Limited (IANA #1007) 308, Pearls Business Park Netaji Subhash Place, Pitampura Delhi, 110034 India

Email: bajaj.vikram@gmail.com

Dear Vikram Bajaj:

Please be advised that as of 29 January 2021, Net 4 India Limited ("Net 4 India") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA"). This breach results from:

1. Net 4 India's failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

Please refer to the attachment for details regarding this breach.

By not providing the records and information requested in the compliance cases (numbers 00976469, 00977574, 00982277, 00982175, 00984400, 00986557, 00987371, 00988897, 00992182, 00993354, 00977648, 00987386) detailed in the chronologies below, which affect 28 domain name registrations, Net 4 India has failed to:

- 1. Demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provides the Registered Name Holder ("RNH") with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5) calendar days of the RNH's initial request if the registrar does not provide facilities for the RNH to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In addition, with respect to the domain name capitalleague.biz Net 4 India has failed to provide:
 - a. An explanation addressing the allegations that the domain name was transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), without the knowledge or authorization of the RNH; and



- b. Records to demonstrate compliance with Section I.A.3 of the Transfer Policy. Specifically, that through the mandatory Form of Authorization ("FOA"), Net 4 India confirmed the RNH's intent to transfer the domain name when the relevant notice of pending transfer was received from the registry operator.
- 2. Demonstrate compliance with Section II.B and II.C of the Transfer Policy which, respectively: (1) state that, in general, registrants must be permitted to update their registration data; and (2) enumerate the steps the registrar must follow in doing so.
- 3. Demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy ("ERRP"), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration ("RAE") must be permitted by the registrar to renew the expired registration. In the responses that were received in the compliance cases, Net 4 India appeared to provide the 'Registry Expiry Date' displayed through the relevant Registry's Registration Data Directory Service ("RDDS"), also known as Whois service, as evidence that the domain names had been renewed. However, ICANN explained to Net 4 India that the 'Registry Expiry Date' is not indicative of an explicit extension of the registration by your registrar. ICANN then requested specific evidence of the domain name registration renewal completed by your registrar, Net 4 India did not respond to this request.

Additional Concerns

Net 4 India Limited continues to exhibit the same pattern of conduct that led to the notices of breach issued against it by ICANN on 10 December 2020 and 24 December 2020, both of which remain uncured (additional details in the "Prior Uncured Breaches" section). The number of complaints ICANN Contractual Compliance is receiving from RNHs and authorized representatives continues to increase, and such complaints include assertions that Net 4 India is exhibiting a pattern of non-response to domain transfer, renewal and registration data update requests. With regard to the relevant compliance cases, Net 4 India has either been non-responsive or has provided responses that have regularly been untimely and incomplete.

Prior Uncured Breaches

On <u>10 December 2020</u>, ICANN issued a notice of breach against Net 4 India for a number of RAA violations. As of the time of this letter, Net 4 India continues to be in violation of:

 Section 3.3.1 of the RAA, as query-based access to up-to-date data concerning all active registered names sponsored by Net 4 India for each top-level domain in which it is accredited is not being provided through Net 4 India's web-based or port 43 Whois services;



- (2) Section 3.4.3 of the RAA with respect to the transfer and renewal cases included in the breach notice, as not all records and registration data ICANN specifically requested pertaining to the one hundred eighty-five (185) affected domain names have been provided;
- (3) Section 3.6 of the RAA, as Net 4 India failed to make consistent weekly data escrow deposits in the weeks following the 10 December 2020 notice of breach, including deposits on 24 December 2020, 31 December 2020, 7 January 2021 and 28 January 2021; and
- (4) Section 3.9 of the RAA, as Net 4 India has not paid for the totality of past due fees owed to ICANN.

On <u>24 December 2020</u>, ICANN issued a notice of breach against Net 4 India based on the Registrar's violation of Section 3.4.3 of the RAA with respect to ICANN's requests involving four (4) domain names. As of the time of this letter, Net 4 India has not provided any of the registration data and records ICANN specifically requested to ensure the Transfer Policy and the ERRP had been complied with and the relevant RNHs assisted.

ICANN requests that Net 4 India cure all breaches in this 29 January 2021 notice by 19 February 2021, 21 days from the date of this letter, by taking the following actions:

- 1. To demonstrate compliance with the Transfer Policy:
 - a. For the domain names sundaraminfotech.com, drvasudevanpillai.com, gmattrainer.com, cnctinc.com, sppontario.com, sppontariocolleges.com, spptoronto.com, spptorontcolleges.com, sppvancouver.com, sppvancouvercolleges.com, gopinathmenon.com, bharathotel.com, medhaindia.com, medhaindia.mobi, medha.mobi, medharail.com, medhallc.com, medhausa.com, medhatransport.com, medhatransportation.com, medha.com, medhatraction.com, steigenconsultants.com, icaisonepat.org, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - ii. Evidence that each RNH has been provided with the AuthInfo code and the "ClientTransferProhibited" status has been removed, where applicable, in the terms prescribed by Section I.A.5 of the Transfer Policy.
 - iii. Copies of any communications between your registrar and the RNH, or authorized representative, relating to transfer requests.
 - b. For the domain name nrityagram.org, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.



- ii. Evidence that the RNH has been permitted to update the RNH's registration data.
- iii. Confirmation whether your registrar provides the Prior Registrant with the option to opt-out of the 60-day inter-registrar lock that results from a Change of Registrant.
- iv. Confirmation whether the opt-out option in 1.b.iii above has been/will be provided to the RNH for this domain prior to completing the change.
- v. Copies of any communications between your registrar and the RNH, or authorized representative, relating to registration data update and transfer requests.
- c. For the domain name ojm.com, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - ii. Evidence that the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
 - iii. Copies of any communications between your registrar and the RNH, or authorized representative, relating to transfer requests.
- d. For the domain name capitalleague.biz, provide:
 - i. An explanation concerning the circumstances under which the domain name was transferred from Net 4 India to Openprovider.
 - ii. A copy of the FOA Net 4 India sent to the RNH prior to the domain name's transfer from Net 4 India to Openprovider.
 - iii. Explanation and evidence regarding the method by which the AuthInfo code was provided to the RNH, and the date(s) it was provided.
 - iv. Copies of any communications between your registrar and the RNH concerning this matter.
- 2. To demonstrate compliance with the ERRP:
 - a. For the domain names valueprolearning.com, ojm.com and drvasudevanpillai.com, provide:
 - i. Evidence that each domain name has been renewed (such as a copy of your Registrar's RDDS/Whois output showing the updated "Registrar Registration Expiration Date", or system logs showing a successful renew command sent to the registry operator).



If Net 4 India fails to timely cure the breaches noted above and/or fails to provide the information requested by 19 February 2021, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at <u>leticia.castillo@icann.org</u>.

Sincerely,

Juli

Jamie Hedlund Senior Vice President, Contractual Compliance and Consumer Safeguards Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary



ATTACHMENT

Failure to make registered name holder and registration data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA require registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Net 4 India's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

CHRONOLOGIES

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified Net 4 India of the violations associated with the case, including the affected domain names and the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from Net 4 India to become compliant. All inquiries/notices subsequent to each 1st inquiry/notice constituted an additional attempt by ICANN to obtain evidence of compliance from the Registrar. All telephone call details below described further attempts from ICANN to communicate to the Registrar the urgency of the cases and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist Net 4 India in becoming compliant and assist the relevant RNHs. All these attempts were unsuccessful.

Date of Notice	Deadline for Response	Details
22-Sep-2020	29-Sep-2020	ICANN sent 1st compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> . No response received from Registrar.
1-Oct-2020	8-Oct-2020	ICANN sent 2nd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> . No response received from Registrar.
13-Oct-2020	20-Oct-2020	ICANN re-sent 1st compliance inquiry via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com.
20-Oct-2020	N/A	Email from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
3-Nov-2020	10-Nov-2020	ICANN sent follow-up compliance inquiry via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
16-Nov-2020	23-Nov-2020	ICANN sent follow-up compliance inquiry via email to bajaj.vikram@gmail.com, pankaj.s@net4.com,

Chronology (00976469):



		shikha.90712@gmail.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com.
		ICANN re-sent follow-up compliance inquiry via email to
		bajaj.vikram@gmail.com, pankaj.s@net4.com,
16-Nov-2020	23-Nov-2020	shikha.90712@gmail.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
		ICANN called Primary Contact and Compliance Contact at +91
		01145789408 and spoke with Registrar Representative. No
18-Nov-2020	N/A	ability to provide the Registrar with the complaint details. ICANN
		called Primary Contact and Compliance Contact at
		[TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
		ICANN sent 3rd compliance inquiry via email to
		bajaj.vikram@gmail.com, pankaj.s@net4.com,
24-Nov-2020	1-Dec-2020	shikha.90712@gmail.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
		ICANN called Primary Contact and Compliance Contact at +91
3-Dec-2020	N/A	01145789408 and left voicemail with complaint details. ICANN
5-000-2020		called Primary Contact and Compliance Contact at
		[TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
		Due to the Registrar's unresponsiveness, ICANN escalated the
		case to a 1st compliance notice sent via email to
8-Dec-2020	15-Dec-2020	bajaj.vikram@gmail.com, pankaj.s@net4.com,
0 200 2020	10 200 2020	shikha.90712@gmail.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
45 0 0000	N 1/A	ICANN called Primary Contact and Compliance Contact at +91
15-Dec-2020	N/A	01145789408 and at [TELEPHONEREDACTED] No ability to provide the
		Registrar with the complaint details or to leave a voicemail.
		ICANN sent 2nd compliance notice via email to
04 Dec 0000	0 1 0004	bajaj.vikram@gmail.com, pankaj.s@net4.com,
21-Dec-2020	6-Jan-2021	shikha.90712@gmail.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
24 Dec 2020	NI/A	ICANN called Primary Contact and Compliance Contact at +91
24-Dec-2020	N/A	01145789408 and at [TELEPHONEREDACTED] No ability to provide the
		Registrar with the complaint details or to leave a voicemail.
		ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No
8-Jan-2021	NI/A	ability to provide the Registrar with the complaint details. ICANN
0-3411-2021	N/A	called Primary Contact and Compliance Contact at
		[TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
		ICANN sent 3rd compliance notice via email to
13-Jan-2021	20-Jan-2021	bajaj.vikram@gmail.com, pankaj.s@net4.com,
		<u>bajaj.vikian(@gmail.com, panka].S(@net4.com, </u>

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		shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00977574):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance inquiry via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary and Compliance Contact at +91 01145789408. No answer and no ability to leave a voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No ability to provide Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
20-Nov-2020	26-Nov-2020	ICANN sent 3rd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.



3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to <u>bajaj.vikram@gmail.com, pankaj.s@net4.com,</u> <u>shikha.90712@gmail.com, icannresolutions@net4.com,</u> [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
14-Dec-2020	21-Dec-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent a 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>shikha.90712@gmail.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00982277):

Date of Notice	Deadline for Response	Details
21-Oct-2020	28-Oct-2020	ICANN sent 1st compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com.
8-Nov-2020	N/A	Email from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
24-Nov-2020	1-Dec-2020	ICANN sent 2nd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	ICANN sent 3rd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com.
6-Dec-2020	N/A	Email from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
8-Dec-2020	11-Dec-2020	ICANN sent follow-up compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com. No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to <u>bajaj.vikram@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>shikha.90712@gmail.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com. No response received from Registrar.
8-Jan-2021	15-Jan-2021	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com



		and jasjit.s@net4.com. No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]. No answer and no ability to leave a voicemail.
21-Jan-2021	28-Jan-2021	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>shikha.90712@gmail.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTEDINO answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00982175):

Date of Notice	Deadline for Response	Details
21-Oct-2020	28-Oct-2020	ICANN sent 1st compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>icannresolutions@net4.com</u> , <u>pankaj.s@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
2-Nov-2020	9-Nov-2020	ICANN sent 2nd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary and Compliance Contact at +91 01145789408. No answer and no ability to leave a voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]No ability to provide Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN



		called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]No answer and no ability to leave a voicemail.
20-Nov-2020	26-Nov-2020	ICANN sent 3rd compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at +91 [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
4-Dec-2020	11-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
14-Dec-2020	21-Dec-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTEDINO answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
30-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00984400):

Date of Notice	Deadline for Response	Details
2-Nov-2020	9-Nov-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> and <u>shikha.90712@gmail.com</u> . No response received from Registrar.
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED]No answer and no ability to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTEDINO answer and no ability to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Jan-2021	28-Jan-2021	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com. No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTEDINO answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00986557):

Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] and jasjit.s@net4india.com. No response received from Registrar.
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] and jasjit.s@net4india.com. No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTEDINO answer and no ability to leave a voicemail.
27 - Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTED No answer and no ability to leave a voicemail.
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] and jasjit.s@net4india.com. No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00987371):

Date of Notice	Deadline for Response	Details
18-Nov-2020	25-Nov-2020	ICANN sent 1st compliance inquiry via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com. No response received from Registrar.
30-Nov-2020	7-Dec-2020	ICANN sent 2nd compliance inquiry via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTEDINO answer and no ability to leave a voicemail.
8-Dec-2020	15-Dec-2020	ICANN sent 3rd compliance inquiry via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	Due to the Registrar's unresponsiveness, ICANN escalated the case to a 1st compliance notice sent via email to bajaj.vikram@gmail.com, pankaj.s@net4.com, shikha.90712@gmail.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
5-Jan-2021	12-Jan-2021	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
13-Jan-2021	20-Jan-2021	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> ,



		pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTED No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00988897):

Date of Notice	Deadline for Response	Details
		ICANN sent 1st compliance inquiry via email to
		bajaj.vikram@gmail.com, shikha.90712@gmail.com,
26-Nov-2020	3-Dec-2020	pankaj.s@net4.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
		ICANN sent 2nd compliance inquiry via email to
		bajaj.vikram@gmail.com, shikha.90712@gmail.com,
4-Dec-2020	11-Dec-2020	pankaj.s@net4.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
		ICANN called Primary Contact and Compliance Contact at +91
15-Dec-2020	N/A	01145789408 and at [TELEPHONEREDACTED] No ability to provide the
		Registrar with the complaint details or to leave a voicemail.
		ICANN sent 3rd compliance inquiry via email to
		bajaj.vikram@gmail.com, shikha.90712@gmail.com,
16-Dec-2020	23-Dec-2020	pankaj.s@net4.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com
		and jasjit.s@net4.com. No response received from Registrar.
		ICANN called Primary Contact and Compliance Contact at +91
24-Dec-2020	N/A	01145789408 and at [TELEPHONEREDACTED] No ability to provide the
		Registrar with the complaint details or to leave a voicemail.
		Due to the Registrar's unresponsiveness, ICANN escalated the
		case to a 1st compliance notice sent via email to
4-Jan-2020	11-Jan-2020	bajaj.vikram@gmail.com, pankaj.s@net4.com,
		shikha.90712@gmail.com, icannresolutions@net4.com,
		[EMAIL REDACTED] jasjit.s@net4india.com

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		and jasjit.s@net4.com. No response received from Registrar.
12-Jan-2021	19-Jan-2021	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at ITELEPHONEREDACTED No answer and no ability to leave a voicemail.
20-Jan-2021	27-Jan-2021	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
28-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and provided Primary Contact with complaint details.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00992182):

Date of Notice	Deadline for Response	Details
9-Dec-2020	16-Dec-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and jasjit.s@net4.com. No response received from Registrar.
18-Dec-2020	5-Jan-2021	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com, shikha.90712@gmail.com, pankaj.s@net4.com, icannresolutions@net4.com, [EMAIL REDACTED] jasjit.s@net4india.com and jasjit.s@net4.com. No response received from Registrar.



24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	15-Jan-2021	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>pankaj.s@net4.com</u> , <u>icannresolutions@net4.com</u> , [EMAIL REDACTED] <u>jasjit.s@net4india.com</u> and <u>jasjit.s@net4.com</u> . No response received from Registrar.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00993354):

Date of Notice	Deadline for Response	Details
15-Dec-2020	22-Dec- 2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
4-Jan-2021	11-Jan- 2021	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.



Date of Notice	Deadline for Response	Details
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at (TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details and no ability to leave a voicemail.
12-Jan-2021	19-Jan- 2021	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at (TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details and no ability to leave a voicemail.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
28-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and provided Primary Contact with complaint details.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

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Chronology (00977648):

Date of Notice	Deadline for Response	Details
29-Sep-2020	6-Oct-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] and <u>icannresolutions@net4.com</u> . No response received from Registrar.
7-Oct-2020	14-Oct-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , jasjit.s@net4.com, jasjit.s@net4india.com, [EMAIL REDACTED] and icannresolutions@net4.com.
7-Oct-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
8-Oct-2020	15-Oct-2020	ICANN sent follow-up compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] and <u>icannresolutions@net4.com</u> .
13-Oct-2020	N/A	Email received from Registrar (<u>icannresolutions@net4.com</u>) insufficient to demonstrate compliance.
19-Oct-2020	26-Oct-2020	ICANN sent follow-up compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.



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Date of Notice	Deadline for Response	Details
25-Nov-2020	2-Dec-2020	ICANN sent follow-up compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at + 91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.



Date of Notice	Deadline for Response	Details
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00987386):

Date of Notice	Deadline for Response	Details
18-Nov-2020	25-Nov-2020	ICANN sent 1st compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
3-Dec-2020	10-Dec-2020	ICANN sent 2nd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Primary Contact and Compliance Contact at [TELEPHONEREDACTED] No answer and no ability to leave a voicemail.
14-Dec-2020	21-Dec-2020	ICANN sent 3rd compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED] <u>icannresolutions@net4.com</u> and <u>pankaj.s@net4.com</u> . No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED] No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONEREDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
19-Jan-2021	26-Jan-2021	ICANN sent follow-up compliance notice via email to <u>bajaj.vikram@gmail.com</u> , <u>shikha.90712@gmail.com</u> , <u>jasjit.s@net4.com</u> , <u>jasjit.s@net4india.com</u> , [EMAIL REDACTED]



		icannresolutions@net4.com and pankaj.s@net4.com. No response received from Registrar.
22-Jan-2021	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details. ICANN called Primary Contact and Compliance Contact at TELEPHONEREDACTED No answer and no ability to leave a voicemail.
29-Jan-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
29-Jan-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

net4.com/net4app/asp	x/domains/whois.aspx					
IN Links 🔇 Iron Mountain Con.	🗔 Whois Lookup, Do 🦪 RADARVie	ew - ICA 🔞 Advisory: Clarifica 🍪 Regis	strar IDs/RDAP 🔯 ComplianceNotice 🔗 🚧 ADP	【 [#PUC-111-72031 🜔 Home 🔞 Submitting a com 🔯 Com		
		with us. Further Our Technical Email support is	all centers are operating with minimal staff, so the cal s functional 24 * 7 kindly email us on corporatesuppor ant Gateway is up and running smoothly			
	net4	net4 Segin/Sign up ₹ → PMy Cart (0)				
	6 ⁰ DOMAINS €HOSTI	NG ⊠EMAIL @ EASYsite	OFFICE 365 CLOUDSERVER	SSL &RESELLER		
	Whois - Who owns this domain					
	Q thegautam.com SEARCH					

What is WHOIS?

When you register a domain name, ICANN (Internet Corporation for Assigned Names and Numbers), the governing body for the domain name system, requires your domain registrar to submit your personal contact information to the WHOIS database. Once your domain is listed in this online directory, the information is available to anyone who chooses to check the domain name using the WHOIS search tool.

Important Information on WHOIS Listing:



Internet Corporation for Assigned Names and Numbers

12025 Waterfront Drive, Suite 300 Los Angeles, CA 90094-2536 USA

Voice: +1-310-301-5800 Fax: 310-857-2737

Customer Statement

Net 4 India Limited D-25, Sector 3 Noida Uttar Pradesh 201301 India Statement Date:2021-03-15Customer Number:RAR001007Currency:USD

Document No.	Code	Date	Due Date	Description	Amount Due	Credit	Balance
1100310535	SLS	2020-10-31	2020-11-30		3,339.64		3,339.64
1100310535	PMT	2021-01-22		ICANN WIRE: 021565657: 4,500.00		3,176.46	163.18
1100321251	SLS	2021-01-15	2021-02-14		1,000.00		1,163.18
1100328514	SLS	2021-01-31	2021-03-02		2,979.46		4,142.64
1100335004	SLS	2021-03-12	2021-04-11		1,000.00		5,142.64
1100335005	SLS	2021-03-12	2021-04-11		1,000.00		6,142.64

Total	Current	1-30 Days past due	31-60 Days past due	61-90 Days past due	90+ Days past due
6,142.64	2,000.00	3,979.46	0.00	0.00	163.18
Codes:	SLS = Inv	voice FIN =	Late Fee CM =	Credit Memo PI	MT = Payment

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