



23 December 2024

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

[REDACTED]
VIP Internet Industry Limited (IANA#3833)
[REDACTED]

Email: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 23 December 2024, VIP Internet Industry Limited (“VIP Internet” or “Registrar”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 4 December 2023 (“RAA”). This breach results from:

1. VIP Internet’s failure to pay past due accreditation fees, in violation of Section 3.9 of the RAA.

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

2. VIP Internet’s failure to implement a Registration Data Access Protocol (“RDAP”) Directory Service that uses the most recent version of the RDAP Technical Implementation Guide and RDAP Response Profile posted at <https://icann.org/gtld-rdap-profile>, as required by Section 3.3.1 of the RAA and Section 1.2.1 of the Registration Data Directory Service (“RDDS”) Specification of the RAA.
3. VIP Internet’s failure to provide to ICANN current information as specified in the Registrar Information Specification of the RAA (“RIS”), as required by Section 3.17 of the RAA.

4. VIP Internet's failure to provide to ICANN current documentation demonstrating that the Registrar entity is in good standing, as required by Section 3.17 of the RAA and Section 6 of the RIS.

Please refer to the attachment for details regarding this Notice of Breach.

Additional Concerns

VIP Internet has repeatedly failed to respond to ICANN's requests regarding contractual requirements, including, but not limited to, with respect to the Registrar training required by Section 3.13 of the RAA. ICANN made multiple attempts in writing and placed repeated telephone calls to VIP Internet to put the Registrar on notice of VIP Internet's outstanding compliance issues. ICANN's efforts to contact VIP Internet to resolve the issues were unsuccessful.

In addition, because the Registrar's website is not functioning, ICANN is unable to currently confirm VIP Internet's compliance with RAA requirements regarding the display of certain content on the Registrar's website.

ICANN requests that VIP Internet cure the breach by 13 January 2025, 21 days from the date of this letter, by taking the following actions:

1. Pay all past and currently due accreditation fees, as required by Section 3.9 of the RAA.
2. Demonstrate that VIP Internet's RDAP Directory Service provides free public query-based access to up-to-date (i.e., updated at least daily) data concerning all active Registered Names sponsored by Registrar in any generic top-level domain ("gTLD").
3. Demonstrate that VIP Internet has implemented either the February-2019 or February-2024 versions of the RDAP Technical Implementation Guide and the RDAP Response Profile posted at <https://icann.org/gtld-rdap-profile> in its RDAP Directory Service. Note that after 21 August 2025, gTLD registries and ICANN-accredited registrars are required to implement the February-2024 versions, and the February-2019 versions will be considered obsolete.
4. Provide ICANN with a completed RIS form including accurate and current information, the required documentation of good standing, and a link to the location of the applicable information within the Registrar's website where VIP Internet displays the following:
 - a. The name and positions of the Registrar's officers.

- b. The Registrar's correspondence address.
 - c. If different from the Registrar's correspondence address in item 4b, the Registrar's principal place of business, including address, phone number, fax number and email address.
 - d. If applicable, the Registrar's ultimate parent entity.
5. Provide the first name, last name, email address, title (primary contact or designee), and training completion date of at least one (1) current employee at the Registrar's organization who has completed the RAA Registrar Training course, as per Section 3.13 of the RAA.
 6. Provide the remediation measures, including implementation dates, that VIP Internet will take to ensure the Registrar timely and fully responds to ICANN's requests related to contractual obligations.

If VIP Internet fails to timely cure the violations explained in this Notice of Breach and provide the information requested by 13 January 2025, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo ([REDACTED]).

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund

Senior Vice President, Contractual Compliance and U.S. Government Engagement

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

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. VIP Internet owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

Failure to provide a RDAP Directory Service that uses the most recent versions of the RDAP Technical Implementation Guide and RDAP Response Profile

Section 3.3.1 of the RAA requires registrars to provide a RDAP Directory Service as defined in the RDDS Specification of the RAA, which provides free public query-based access to registration data for all domain names sponsored by the registrar in any gTLD. Section 1.2.1 of the RDDS Specification of the RAA requires registrars to implement the most recent version of the RDAP Technical Implementation Guide and RDAP Response Profile posted at <https://icann.org/gtld-rdap-profile>. ICANN tested the Registrar's RDAP Directory Service using the registered uniform resource locator ("URL") provided to ICANN, which established that the Registrar has failed to implement RFCs required by the RDAP Technical Implementation Guide, resulting in the failure of domain name queries for the Registrar's sponsored domains.

Failure to provide ICANN RIS and a Certificate of Good Standing

Section 3.17 of the RAA requires registrars to provide and maintain accurate information specified in the RIS. In addition, registrars are required to publish on each website through which they provide or offer Registrar Services the information specified as requiring such publication in the RIS. Section 6 of the RIS requires the registrar to provide current documentation demonstrating that the Registrar is established and in good standing. Despite ICANN's multiple requests, the Registrar has not provided current RIS information nor a current certificate of good standing.

CHRONOLOGY

In the compliance case detailed in the chronology below, ICANN notified the Registrar of the violations, including the relevant ICANN policies, agreements and processes.

Each communication requested the evidence, information and actions needed from VIP Internet to become compliant. Each subsequent communication to the compliance notifications constituted an additional attempt by ICANN to obtain evidence of compliance from the Registrar. The telephone call details below describe further attempts from ICANN to communicate to the Registrar the details of the case, and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist VIP Internet in becoming compliant. All efforts were unsuccessful.

Chronology (Case #01205008):

Date of Notice	Deadline for Response	Details
18-Mar-2023	24-Mar-2023	ICANN sent 1st compliance notice via email to [REDACTED], [REDACTED], and [REDACTED]. No response received from the Registrar.
13-Apr-2023	20-Apr-2023	ICANN sent 2nd compliance notice via email to [REDACTED], [REDACTED], and [REDACTED]. No response received from the Registrar.
14-Apr-2023	N/A	ICANN called Compliance and Primary Contact at [REDACTED] and left voicemail with complaint details.
25-Apr-2023	2-May-2023	ICANN sent 3rd compliance notice via email to [REDACTED], [REDACTED], [REDACTED], and [REDACTED].

Date of Notice	Deadline for Response	Details
26-Apr-2023	N/A	Response from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
2-May-2023	2-May-2023	ICANN sent a follow up compliance notice via email to [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. No response received from the Registrar.
9-May-2023	N/A	ICANN called Registrar's representative at [REDACTED] and provided the Registrar's representative with complaint details.
9-May-2023	N/A	ICANN conducted compliance check to identify other areas of noncompliance.
20-Dec-2024	N/A	ICANN conducted compliance check to identify other areas of noncompliance.
23-Dec-2024	N/A	To date, the Registrar has not taken the necessary action to become compliant with its RAA obligations.