



9 May 2025

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

[REDACTED]

Intracom Middle East FZE (IANA#1875)

[REDACTED]

Emails: [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED]

Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 9 May 2025, Intracom Middle East FZE ("Intracom" or "Registrar") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 31 June 2024 ("RAA"). This breach results from:

1. Intracom'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.
2. Intracom's failure to timely submit data escrow deposits to an ICANN-approved data escrow agent according to the schedule, terms, and format specified by ICANN, as required by Section 3.6 of its RAA.

In addition, the Registrar has been deemed non compliant in the following area:

3. Intracom'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. Intracom'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.
5. Intracom's failure to pay past due accreditation fees, as required by Section 3.9 of the RAA.

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

Additional Concerns

During the complaint processing, ICANN Contractual Compliance staff attempted to contact Intracom using the Registrar's contact details on file. All attempts to contact the Registrar were unsuccessful, including attempts via email, telephone, and facsimile. Recent communications sent via email in April 2025 were returned as undeliverable. All call attempts were either unanswered or the provided telephone number failed to connect and all facsimiles failed as undeliverable. All efforts made by ICANN to put the Registrar on notice of Intracom's outstanding compliance issues are described in the chronologies below.

As of the date of this Notice of Breach, the Registrar's website does not resolve. Accordingly, ICANN Contractual Compliance staff is unable to confirm the Registrar is compliant with its publication requirements under the RAA.

Additionally, pursuant to Section 3.15 of the RAA, ICANN-accredited registrars are required to complete and deliver to ICANN a Compliance Certificate within twenty (20) days following the end of each calendar year, certifying compliance with the terms and conditions of the RAA. Intracom has not returned the required Compliance Certification, and will be unable to do so unless it cures all other outstanding breaches and is able to certify compliance with the terms and conditions of the RAA.

ICANN requests that Intracom cure the breach by 30 May 2025, 21 days from the date of this letter, by taking the following actions:

1. Demonstrate that Intracom'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).

2. Demonstrate that Intracom 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.
3. Provide ICANN with one Registered Name sponsored by the Registrar in any gTLD to be used by ICANN in monitoring RDAP by uploading the Registered Name into the Registrar's Naming Services portal (NSp) account.
4. Deposit gTLD registration data on a weekly basis to an ICANN-approved Data Escrow Agent ("DEA") and ensure that the deposits meet the required specifications. This includes promptly taking all necessary steps to successfully complete the transition from NCC Group to DENIC Services GmbH & Co. KG ("DENIC") or to an alternative ICANN-approved DEA to deposit Escrow Records for every gTLD name under its management as registrar.
5. Provide ICANN with the Registrar's current website(s), confirm whether the Registrar provides or offers Registrar Services through the website(s), and provide:
 - a. A link to the location where Intracom publishes its web form and/or abuse-decided email address, as well as the description of the Registrar's processes for the receipt, handling and tracking of abuse reports.
 - b. If Intracom provides or offers Registrar Services through its website(s), a link to the location where the Registrar publishes the Registrar's renewal fees, post-expiration renewal fees (if different) and redemption/restore fees; a description of the methods used to deliver the Registrar's renewal notifications; and the Registrar's deletion and auto-renewal policies.
 - c. A link to the location where the Registrar publishes and/or provides a link to the Registrants' Benefits and Responsibilities Specification of the RAA.
6. 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 Intracom 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 3b, 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.
- 7. 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.
- 8. Pay all past due accreditation fees, as required by Section 3.9 of the RAA.
- 9. Provide the remediation measures, including implementation dates, that Intracom will take to ensure that:
 - a. The Registrar has provided up to date contact information to ICANN to facilitate all necessary communications.
 - b. The Registrar timely and fully responds to ICANN's requests related to contractual obligations.
- 10. After curing all items in this Notice of Breach, provide a certificate executed by the president, chief executive officer, chief financial officer, or chief operating officer (or their equivalents) certifying compliance with the terms and conditions of the RAA.

If Intracom fails to timely cure the violations explained in this Notice of Breach and provide the information requested by 30 May 2025, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Amanda Rose ([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 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>. The Registrar's RDAP uniform resource locator ("URL") provided to ICANN is not functioning and Intracom's RDAP fails to meet the Service Level Requirements in Section 2 of the RDDS Specification of the RAA. As a result, domain name queries fail to return registration data for domain names sponsored by the Registrar.

Failure to deposit gTLD registration data to an ICANN-approved DEA

Section 3.6 of the RAA requires ICANN-accredited registrars to submit data escrow deposits according to the schedule, terms, and format specified by ICANN. Registrars may use an [ICANN-Designated Registrar Data Escrow Agent](#) (DEA) at no charge or use an [ICANN-Approved Registrar DEA](#) at the registrar's expense for depositing their escrow records. Registrar data escrow requirements, as prescribed in the RAA, are further detailed in the [Registrar Data Escrow Specification](#). As of 21 August 2024, registrars are permitted to implement the Registration Data Policy, which modifies certain requirements within Section 3.6 of the RAA. Accordingly, until the 21 August 2025 effective date of the Registration Data Policy, registrars may implement either the 2007 or the 2024 version of the Registrar Data Escrow Specification. Intracom has failed to take the necessary actions to complete the transition from NCC Group to DENIC Services GmbH & Co. KG ("DENIC") or to an alternative ICANN-approved DEA. This Registrar's lack of action resulted in Intracom's inability to timely deposit gTLD registration data in violation of Section 3.6 of its RAA. Further, by failing to timely deposit gTLD registration data, Intracom has been putting Registered Name Holders at risk of losing their domain name registrations with no chance of recovery in the event of Registrar failure, accreditation termination or nonrenewal.

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. The Registrar has not provided current RIS information nor a current certificate of good standing.

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

CHRONOLOGY

In the compliance cases detailed in the chronologies 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 Intracom 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 cases, and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist Intracom in becoming compliant. All efforts were unsuccessful.

Chronology (Case #01415287):

Date of Notice	Deadline for Response	Details
23-Apr-2025	30-Apr-2025	ICANN sent escalated compliance notice via email to [REDACTED] and [REDACTED]. Email rejected by [REDACTED] and [REDACTED].
23-Apr-2025	N/A	ICANN sent escalated compliance notice via fax to [REDACTED]. Fax unsuccessful.
24-Apr-2025	30-Apr-2025	ICANN forwarded escalated compliance notice via email to [REDACTED]. Email rejected by [REDACTED].
30-Apr-2025	N/A	ICANN called Primary Contact at [REDACTED] and [REDACTED]. No answer and no ability to leave a voicemail. ICANN called Compliance and Secondary Contact at [REDACTED] and [REDACTED]. No answer and no ability to leave a voicemail.

Date of Notice	Deadline for Response	Details
9-May-2025	N/A	ICANN conducted compliance check to identify other areas of noncompliance.
9-May-2025	N/A	To date, the Registrar has not taken the necessary action to become compliant with its RAA obligations.

Chronology (Case #01357285):

Date of Notice	Deadline for Response	Details
3-Sep-2024	10-Sep-2024	ICANN sent 1st compliance notice via email to [REDACTED]. No response received from the Registrar.
11-Sep-2024	18-Sep-2024	ICANN sent 2nd compliance notice via email to [REDACTED] and [REDACTED]. No response received from the Registrar.
16-Sep-2024	N/A	ICANN called Primary Contact at [REDACTED] and provided Primary Contact with compliance case details.
20-Sep-2024	27-Sep-2024	ICANN sent 3rd compliance notice via email to [REDACTED] and [REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
23-Sep-2024	N/A	ICANN called Primary Contact at [REDACTED] and provided Primary Contact with compliance case details.
22-Oct-2024	29-Oct-2024	ICANN sent escalated compliance notice via email to [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] and [REDACTED]. No response received from the Registrar.
23-Oct-2024	N/A	ICANN called Primary Contact at [REDACTED]. No answer and no ability to leave a voicemail. ICANN called Secondary Contact at [REDACTED] and left voicemail with complaint details.
8-May-2025	N/A	ICANN conducted compliance check to identify other areas of noncompliance.
8-May-2025	N/A	To date, the Registrar has not taken the necessary action to become compliant with its RAA obligations.