



19 December 2025

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

[REDACTED]

Brennercom Limited (IANA#1641)

[REDACTED]

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

Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 19 December 2025, Brennercom Limited (“Registrar” or “Brennercom”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 5 July 2022 (“RAA”). This breach results from:

1. Brennercom’s failure to implement a Registration Data Access Protocol (“RDAP”) Directory Service that: (a) provides access to all required registration data concerning all active domain names sponsored by the Registrar in any generic top-level domain (“gTLD”); and (b) 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. Brennercom’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.

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

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

4. Failure to publish details of the mechanism and process for submitting requests for the disclosure of non-public Registration Data ("Disclosure Requests") in a direct link on its homepage, as required by Section 10.1 of the Registration Data Policy.

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

Additional Concerns

Brennercom has repeatedly failed to respond to ICANN's written requests and telephone calls regarding contractual requirements. As described in the chronologies below, ICANN made multiple attempts in writing and placed repeated telephone calls to Brennercom to put the Registrar on notice of the Registrar's' outstanding compliance issues. ICANN's efforts to contact Brennercom to resolve the issues were unsuccessful.

In addition, ICANN has been unable to locate information on the Registrar's website, which must be displayed according to the RAA, including:

- A. An email address or web form to receive reports of abuse, including reports of DNS Abuse and Illegal Activity, involving domain names sponsored by the Registrar which is conspicuously and readily accessible from the homepage of the Registrar's website, as required by Section 3.18.1 of the RAA.
- B. A description of the Registrar's procedures for the receipt, handling, and tracking of abuse reports, as required by Section 3.18.4 of the RAA.
- C. The correspondence address of the Registrar, as required by Section 3.17 of the RAA and Section 7 of the Registrar Information Specification of the RAA ("RIS").
- D. The name and positions of the Registrar's officers, as required by Section 3.17 of the RAA and Section 18 of the RIS.
- E. The details of the Registrar's deletion and auto-renewal policies, as required by Section 3.7.5.5 of the RAA and Expired Domain Deletion Policy ("EDDP").
- F. The Registrar's redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP").
- G. The methods used to deliver pre- and post-expiration notifications described in Section 2 of the ERRP, as required by Section 4.2 of the ERRP.

ICANN requests that Brennercom cure the breach by 9 January 2026, 21 days from the date of this letter, by taking the following actions:

1. Demonstrate that Brennercom’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 Brennercom has implemented the February-2024 version of the RDAP Profile, including the RDAP Technical Implementation Guide and the RDAP Response Profile posted at <https://icann.org/gtld-rdap-profile> in its RDAP Directory Service.
3. Provide ICANN with one Registered Name sponsored by Brennercom 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. Pay all past due accreditation fees, as required by Section 3.9 of the RAA.
6. Publish a direct link on Brennercom’s homepage where the Registrar’s mechanism and process for submitting Disclosure Requests is detailed, which specifies (a) the required format and content of requests, (b) the means of providing a response to the requestor, and (c) the anticipated timeline for responses.
7. Provide a link to the location within the Registrar’s website where Brennercom displays:
 - a. A web form and/or abuse-dedicated email address to receive abuse reports.
 - b. A description of the Registrar’s processes for the receipt, handling and tracking of abuse reports.
 - c. The name and positions of the Registrar’s officers.
 - d. The Registrar’s correspondence address.
 - e. The details of the Registrar’s deletion and auto-renewal policies.
 - f. The Registrar’s redemption/restore fees.
 - g. A description of the methods used to deliver the Registrar’s renewal notifications.

8. Provide the remediation measures, including implementation dates, that Brennercom will take to ensure that it timely and fully responds to ICANN's requests related to contractual obligations.

If Brennercom fails to timely cure the violations explained in this Notice of Breach and provide the information requested by 9 January 2026, 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, Global Government Engagement and Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to provide an 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 an 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>. Brennercom has registered a base RDAP uniform resource locator (“URL”) in the IANA registry (<https://rdap.brennercom.com/rdap/>). However, the RDAP service is not functioning and all tested 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 required to implement the 2025 version of the Registrar Data Escrow Specification. Brennercom 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. The Registrar's lack of action resulted in Brennercom'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, Brennercom 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 pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Brennercom owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

Failure to publish the mechanism and process for submitting Disclosure Requests

Section 10.1 of the Registration Data Policy requires registrars to publish on their homepage (a publicly available webpage where their domain name services are offered) a direct link to a page where the mechanism and process for submitting Disclosure Requests is detailed. The



mechanism and process MUST specify (a) the required format and content of requests, (b) the means of providing a response to the requestor, and (c) the anticipated timeline for responses. This information is not currently published on the Registrar's homepage (www.webhosting24.us/brennercom.com).

CHRONOLOGY

In the compliance cases detailed in the chronologies below, ICANN notified Brennercom of the violations, including the relevant ICANN policies, agreements and processes.

Each communication requested the evidence, information and actions needed from Brennercom 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 Brennercom in becoming compliant. All efforts were unsuccessful.

Chronology (Case #01416885):

Date of Notice	Deadline for Response	Details
29-Apr-2025	6-May-2025	ICANN sent escalated compliance notice via email to [REDACTED]. No response received from the Registrar.
8-May-2025	N/A	ICANN sent escalated compliance notice via fax to [REDACTED]. Fax successful.
12-May-2025	N/A	ICANN called Primary and Compliance Contact at [REDACTED]. Left message with case details. ICANN called Compliance and Primary Contact at [REDACTED]. No answer and no ability to leave a voicemail.
15-Dec-2025	N/A	ICANN sent follow up escalated compliance notice via email to [REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
16-Dec-2025	N/A	ICANN called Compliance and Primary Contact at [REDACTED]. No answer and no ability to leave a voicemail.
19-Dec-2025	N/A	ICANN conducted compliance check to identify other areas of noncompliance.
19-Dec-2025	N/A	To date, the Registrar has not taken the necessary action to become compliant with its RAA obligations.

Chronology (Case #01448368):

Date of Notice	Deadline for Response	Details
10-Jul-2025	17-Jul-2025	ICANN sent 1st compliance notice via email to [REDACTED], and [REDACTED]. No response received from the Registrar.
25-Jul-2025	1-Aug-2025	ICANN sent 2nd compliance notice via email to [REDACTED], and [REDACTED]. No response received from the Registrar.
31-Jul-2025	N/A	ICANN called Primary and Compliance Contact at [REDACTED] and provided Primary Contact with complaint details.

Date of Notice	Deadline for Response	Details
19-Aug-2025	26-Aug-2025	ICANN sent 3rd compliance notice via email to [REDACTED], and [REDACTED]. No response received from the Registrar.
19-Aug-2025	N/A	ICANN sent 3rd compliance notice via fax to [REDACTED]. Fax successful.
19-Aug-2025	N/A	Email from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
27-Aug-2025	2-Sep-2025	ICANN sent follow up compliance notice via email to [REDACTED]. No response received from the Registrar.
16-Dec-2025	N/A	ICANN called Compliance and Primary Contact at [REDACTED]. No answer and no ability to leave a voicemail.
19-Dec-2025	N/A	ICANN conducted compliance check to identify other areas of noncompliance.
19-Dec-2025	N/A	To date, the Registrar has not taken the necessary action to become compliant with its RAA obligations.

Chronology (Case #01366944):

Date of Notice	Deadline for Response	Details
1-Oct-2024	8-Oct-2024	ICANN sent 1st compliance notice via email to [REDACTED]. No response received from the Registrar.
10-Oct-2024	17-Oct-2024	ICANN sent 2nd compliance notice via email to [REDACTED] and [REDACTED]. No response received from the Registrar.
11-Oct-2024	N/A	ICANN called Primary and Compliance Contact at [REDACTED]. No answer and no ability to leave a voicemail.
23-Oct-2024	30-Oct-2024	ICANN sent escalated compliance notice via email to [REDACTED] and [REDACTED]. No response received from the Registrar.
23-Oct-2024	N/A	ICANN sent escalated compliance notice via fax to [REDACTED]. Fax unsuccessful.
4-Nov-2024	N/A	Email received from the Registrar outside of the compliance case ([REDACTED]) insufficient to demonstrate compliance.
5-Nov-2024	12-Nov-2024	ICANN sent follow-up compliance notice via email to [REDACTED] and [REDACTED].

Date of Notice	Deadline for Response	Details
12-Nov-2024	N/A	Email from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
13-Nov-2024	20-Nov-2024	ICANN sent follow-up compliance notice via email to [REDACTED], [REDACTED], and [REDACTED].
14-Nov-2024	N/A	Email from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
25-Nov-2024	2-Dec-2024	ICANN sent follow-up compliance notice via email to [REDACTED], [REDACTED], and [REDACTED]. No response received from the Registrar.
12-May-2025	N/A	ICANN called Primary Contact at [REDACTED]. No answer and no ability to leave a voicemail.
15-Dec-2025	N/A	ICANN sent follow-up compliance notice via email to [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. No response received from the Registrar.
16-Dec-2025	N/A	ICANN called Compliance and Primary Contact at [REDACTED]. No answer and no ability to leave a voicemail.

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