

The Internet Corporation for Assigned Names and Numbers

26 June 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Rob Golding
Discount Domains Ltd. (IANA #1369)
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United Kingdom

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RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Rob Golding,

Please be advised that as of 26 June 2017, Discount Domains Ltd. ("Discount Domains") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 30 April 2014 ("RAA"). This breach results from:

1. Discount Domains' failure to escrow gTLD registration data, as required by Section 3.6 of the RAA.

Please refer to the attachment for details regarding this breach.

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

1. Discount Domains' failure to provide and maintain accurate and current information as specified in the Registrar Information Specification ("RIS"), including its Primary Contact and documentation demonstrating Discount Domains is in good standing, as required by Section 3.17 of the RAA;

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Istanbul



- 2. Discount Domains' failure to publish the full name and position of all officers of the registrar on its website, as required by Section 3.17 of the RAA and Section 17 of the RIS of the RAA;
- 3. Discount Domains' failure to provide an interactive webpage Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by Discount Domains for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA;
- 4. Discount Domains' failure to include a link in its registration agreement to its renewal fees, post-expiration renewal fees (if different) and redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP"); and
- 5. Discount Domains' failure to display the correct ICANN logo on its website, as required by the Logo License Specification of the RAA.

Additional Concerns

Based on the description appearing on Discount Domains' website, Discount Domains may not be sending expiration reminder notices to its registered name holders ("RNHs") at the required intervals. Section 2.1 of the ERRP requires registrars to notify RNHs of the expiration of a domain name approximately one month prior to expiration and approximately one week prior to expiration. If a registration is not renewed by the RNH or deleted by the registrar, registrars must also send a post-expiration reminder notice within five days after expiration of the registration.

The contact information with ICANN for Discount Domains may also be out of date.

ICANN requests that Discount Domains cure these breaches by 17 July 2017, 21 days from the date of this letter, by taking the following actions:

- 1. Deposit gTLD registration data on a weekly basis to an approved escrow agent and ensure that the deposits meet the required specifications;
- 2. Provide ICANN with a completed RIS form, including accurate and current information for its Primary Contact and current documentation demonstrating Discount Domains is in good standing;
- 3. Publish on Discount Domains' website the full name and position of all of its officers;



- 4. Provide an interactive webpage Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by Discount Domains for each TLD in which it is accredited;
- 5. Provide a link to the renewal fees, post-expiration renewal fees (if different) and redemption/restore fees in Discount Domains' registration agreement;
- 6. Display the correct ICANN logo on Discount Domains' website per the Logo License Specification of the RAA, or remove the ICANN logo from Discount Domains' website;
- 7. Explain how Discount Domains' published description of when it sends expiration reminder notices is compliant with the intervals required by the ERRP and if not, provide steps, with implementation dates, that Discount Domain will take to align the frequency of its expiration reminder notices with the ERRP; and
- 8. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that:
 - a. Discount Domains' contacts with ICANN are valid and up to date; and
 - b. Discount Domains responds to ICANN compliance matters timely and completely.

If Discount Domains fails to timely cure the breaches and provide the information requested by 17 July 2017, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Jennifer Scott at jennifer.scott@icann.org.

Sincerely,

Maguy Serad Vice President

Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary







ATTACHMENT

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. Discount Domains' failure to deposit gTLD registration data with an approved escrow agent under the required schedule and terms is a breach of Section 3.6 of the RAA.

Failure to provide and maintain required information

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. Discount Domains' failure to provide to ICANN and maintain accurate and current information as specified in the RIS, including Primary Contact information and current documentation demonstrating Discount Domains is in good standing, is a breach of Section 3.17 of the RAA.

Failure to publish the full name and position of all officers on registrar's website

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. In addition, registrars must publish on each website through which it provides or offers registrar services, the information specified in the RIS as requiring publication. Discount Domains' failure to publish the full name and position of all of its officers on its website is a breach of Section 3.17 of the RAA and Section 17 of the RIS.

Failure to provide an interactive webpage 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. Discount Domains' failure to provide an interactive webpage Whois service is a breach of Section 3.3.1 of the RAA.

Failure to provide a link to renewal fees, post-expiration renewal fees (if different) and redemption/restore fees in registration agreement

Section 4.1 of the ERRP requires registrars to make their renewal fees, post-expiration renewal fees (if different) and redemption/restore fees reasonably available to RNHs and prospective RNHs at the



time of registration of a gTLD name. At a minimum, these fees must be clearly displayed on the registrar's website and a link to these fees must be included in the registrar's registration agreement. Discount Domains' failure to provide a link in its registration agreement to these fees is a breach of Section 4.1 of the ERRP.

Failure to display correct ICANN-Accredited Registrar logo

The Logo License Specification of the RAA requires registrars, if displaying the ICANN-Accredited Registrar logo, to use the logo displayed in the specification. Discount Domains' use of a modified version of the ICANN-Accredited Registrar logo is a breach of the Logo License Specification of the RAA.

Chronology:

Date of Notice	Deadline for Response	Details
28-Apr-2017	8-May-2017	ICANN sent 1st compliance notice via email to adrian@discountdomainsuk.com.
28-Apr-2017	N/A	Email from Registrar (<u>adrian@discountdomainsuk.com</u>) (auto-responder) insufficient to demonstrate compliance.
9-May-2017	16-May-2017	ICANN sent 2nd compliance notice via email to adrian@discountdomainsuk.com .
9-May-2017	N/A	Email from Registrar (<u>adrian@discountdomainsuk.com</u>) (auto-responder) insufficient to demonstrate compliance.
15-May-2017	N/A	ICANN called Primary Contact at +44 1952 898 703. No answer and no ability to leave a voicemail. ICANN called Primary Contact at + 44 1952 898 701. ICANN left voicemail with complaint details.
17-May-2017	N/A	Email from Registrar (rob.golding@astutium.com) insufficient to demonstrate compliance.
17-May-2017	24-May-2017	ICANN sent follow-up compliance notice via email to adrian@discountdomainsuk.com and rob@discountdomainsuk.com .
17-May-2017	N/A	Email from Registrar (<u>adrian@discountdomainsuk.com</u>) (auto-responder) insufficient to demonstrate compliance.
22-May-2017	N/A	Email from Registrar (rob@discountdomainsuk.com) insufficient to demonstrate compliance.



Date of Notice	Deadline for Response	Details
25-May-2017	1-Jun-2017	ICANN sent follow-up compliance notice via email to rob@discountdomainsuk.com . No response received from Registrar.
2-Jun-2017	9-June-2017	ICANN sent 3rd compliance notice via email to rob@discountdomainsuk.com .
2-Jun-2017	N/A	ICANN sent 3rd compliance notice via fax to +44 871 277 6875. Fax successful.
6-Jun-2017	N/A	ICANN called Primary Contact at +44 1952 898 701. Registrar Representative informed ICANN that Primary Contact was unavailable.
7-Jun-2017	N/A	ICANN called Primary Contact at +44 1952 898 701 and provided Registrar Representative with complaint details.
8-Jun-2017	N/A	Email from Registrar (rob@discountdomainsuk.com) insufficient to demonstrate compliance.
9-Jun-2017	16-Jun-2017	ICANN sent follow-up compliance notice via email to rob@discountdomainsuk.com . No response received from Registrar.
22-June-2017	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
26-Jun-2017	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.