

28 April 2022

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE AND COURIER

**RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT**

[REDACTED]  
Domainia Inc. (IANA #1674)  
[REDACTED]

Emails: [REDACTED]  
Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 28 April 2022, Domainia Inc. (“Domainia” or “Registrar”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 10 September 2018 (“RAA”).

This breach results from:

1. Domainia’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 this breach.

Additional Concerns

During the complaint process, ICANN Contractual Compliance staff has noticed that some of Domainia’s contact details on file with ICANN may not be accurate.

Similarly, Domainia failed to respond to ICANN’s requests involving the requirement to complete and deliver the compliance certificate for year 2021 that is mandated by Section 3.15 of the RAA.

ICANN requests that Domainia cure these breaches by 19 May 2022, 21 days from the date of this letter, by taking the following actions:

1. Pay all past and currently due accreditation fees.
2. Provide ICANN with the corrective and preventative action(s) that Domainia will take, with implementation date(s), to: (a) address its pattern of untimely responses to ICANN

Contractual Compliance matters; and (b) to ensure it has provided ICANN with accurate and current contact information.

3. 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) of Domainia certifying compliance with the terms and conditions of the RAA (“compliance certificate”).

If Domainia fails to timely cure the breaches and provide the information requested by 19 May 2022, ICANN may commence the RAA termination process.

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

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund  
Senior Vice President, Contractual Compliance & 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. Domainia owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

## CHRONOLOGY

In the 1st, 2nd and 3rd compliance notices detailed in the chronology below, ICANN notified Domainia of the violations associated with the case, including the relevant ICANN agreement. All telephone call details below described 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 Domainia in becoming compliant. All these attempts were unsuccessful.

### **Chronology (Case# 01006888)**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
10-Sep-2020 21-Sept-2020 6-Oct-2020	N/A	ICANN sent detailed customer statements to Domainia Inc. regarding past due fees.
12-Oct-2020	N/A	Domainia Inc.'s past due fees were referred to ICANN Contractual Compliance.
1-Feb-2021	8-Feb-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
10-Feb-2021	17-Feb-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
16-Feb-2021	N/A	ICANN called Primary and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
16-Feb-2021	N/A	ICANN received voicemail from [TELEPHONE REDACTED]. Insufficient to demonstrate compliance.
22-Feb-2021	1-Mar-2021	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
3-Mar-2021	N/A	ICANN called Primary and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Primary Contact with complaint details.
10-May-2021	17-May-2021	ICANN sent 3rd compliance notice to the Registrar via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
10-May-2021	N/A	ICANN called Primary and Compliance Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
27-Apr-2022	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
28-Apr-2022	N/A	To date, the Registrar has not responded to ICANN, and the issue remains unresolved.