



The Internet Corporation for Assigned Names and Numbers

4 August 2016

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Wang Yong  
DomainName Route, Inc. (IANA #1901)  
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Tseung Kwan O, Hong Kong  
China

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

Dear Wang Yong,

Please be advised that as of 4 August 2016, DomainName Route, Inc. ("DomainName Route") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 16 October 2014 ("RAA"). This breach results from:

1. DomainName Route's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA.

Please refer to the attachment for details regarding these breaches.

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

1. DomainName Route's failure to provide domain name data in the specified response format, as required by Section 1.4 of the Registration Data Directory Service (Whois) Specification of the RAA ("Whois Specification");
2. DomainName Route's failure to clearly display on DomainName Route's website, and include a link in its registration agreement, to its redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP");

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3. DomainName Route's failure to display the correct ICANN logo on DomainName Route's website, as required by the Logo License Specification of the RAA;
4. DomainName Route's failure to publish its correspondence address on DomainName Route's website, as required by Section 3.17 of the RAA and Section 7 of the Registrar Information Specification ("RIS") of the RAA;
5. DomainName Route's failure to maintain accurate and current information as specified in the RIS as required by Section 3.17 of the RAA and Sections 8, 9 and 13 of the RIS of the RAA;
6. DomainName Route's failure to publish the full name and position of all officers of the registrar on DomainName Route's website, as required by Section 3.17 of the RAA and Section 17 of the RIS of the RAA; and
7. DomainName Route's failure to publish the ultimate parent entity of DomainName Route on DomainName Route's website, as required by Section 3.17 of the RAA and Section 22 of the RIS of the RAA.

#### Additional Concerns

During the processing of this matter, ICANN was unable to reach DomainName Route's Primary Contact and DomainName Route was non-responsive.

ICANN requests that DomainName Route cure these breaches by 25 August 2016, 21 days from the date of this letter, by taking the following actions:

1. Deposit gTLD registration data on a weekly basis to Iron Mountain Intellectual Property Management, Inc. ("Iron Mountain") and ensure that the deposits meet the required specifications;
2. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification; and
3. Clearly display a link to redemption/restore fees on DomainName Route's website and provide a link to the redemption/restore fees in DomainName Route's registration agreement;



4. Display the correct ICANN logo on DomainName Route's website in accordance with the Logo License Specification of the RAA, or remove the ICANN logo from DomainName Route's website;
5. Publish on DomainName Route's website the correspondence address of DomainName Route, as listed in the RIS document provided to ICANN;
6. Provide ICANN with accurate and current contact information as required by Section 3.17 of the RAA and, as applicable, update DomainName Route's RADAR contact information;
7. Publish on DomainName Route's website the full name and position of all officers of DomainName Route, as listed in the RIS document provided to ICANN;
8. Publish on DomainName Route's website the ultimate parent entity of DomainName Route, as listed in the RIS document provided to ICANN; and
9. Provide ICANN with the corrective and preventative action(s) that DomainName Route will take, with implementation date(s), to address its non-response to ICANN Contractual Compliance.

If DomainName Route fails to timely cure the breaches and provide the information requested by 25 August 2016, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Jennifer Scott at [jennifer.scott@icann.org](mailto:jennifer.scott@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad", is written over a light blue circular watermark.

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. DomainName Route's failure to deposit gTLD registration data with Iron Mountain or a reputable escrow agent is a breach of Section 3.6 of the RAA.

### Failure to display required Whois format

Section 1.4 of the Whois Specification of the RAA requires registrars to display domain name data in a specified format for Whois query responses. The format of responses shall contain all the elements and follow a semi-free text format outlined in Section 1.4 of the Whois Specification. DomainName Route's failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA.

### Failure to clearly display a link to redemption/restore fees on registrar's website

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. DomainName Route's failure to provide a link to or clearly display its redemption/restore 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. DomainName Route's use of a modified version of the ICANN-Accredited Registrar logo is a breach of the Logo License Specification of the RAA.

### Failure to publish registrar's correspondence address 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. DomainName Route's failure to publish its RIS correspondence address on DomainName Route's website is a breach of Section 3.17 of the RAA and Section 7 of the RIS.

Failure to provide and maintain required contact information

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. DomainName Route's failure to maintain and provide to ICANN valid Primary Contact telephone and facsimile numbers where DomainName Route can be reached is a breach of Section 3.17 of the RAA and Sections 8, 9 and 13 of the RIS.

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. DomainName Route's 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 publish the ultimate parent entity 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. DomainName Route's failure to publish the ultimate parent entity of DomainName Route on its website is a breach of Section 3.17 of the RAA and Section 22 of the RIS.

**Chronology:**

Date of Notice	Deadline for Response	Details
8-Jul-2016	15-Jul-2016	ICANN sent 1st compliance notice via email to <a href="mailto:yong@os.com">yong@os.com</a> . No response received from Registrar.
18-Jul-2016	25-Jul-2016	ICANN sent 2nd compliance notice via email to <a href="mailto:yong@os.com">yong@os.com</a> . No response received from Registrar.
21-Jul-2016	N/A	ICANN called Primary Contact at +852 56182666. No answer and no ability to leave a message.



Date of Notice	Deadline for Response	Details
26-Jul-2016	N/A	ICANN called Primary Contact at +852 56182666. No answer and no ability to leave a message.
26-Jul-2016	2-Aug-2016	ICANN sent 3rd compliance notice via email to <a href="mailto:yong@os.com">yong@os.com</a> . No response received from Registrar.
26-Jul-2016	N/A	ICANN sent 3rd compliance notice via fax to +852 56182666. Fax unsuccessful.
28-Jul-2016	N/A	ICANN called Primary Contact at +852 56182666. No answer and no ability to leave a message. ICANN called Registrar Representative at +86 18659072525 and provided complaint details.
29-Jul-2016	N/A	ICANN called Registrar Representative at +86 592 5022285 and provided complaint details.
29-Jul-2016	2-Aug-2016	ICANN re-sent 3rd compliance notice via email to <a href="mailto:3206990197@qq.com">3206990197@qq.com</a> and <a href="mailto:yong@os.com">yong@os.com</a> . No response received from Registrar.
3-Aug-2016	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
4-Aug-2016	N/A	To date, the Registrar has not responded to ICANN with the requested information and the issue remains unresolved.