



17 January 2018

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Yang Xiaodong
Xin Net Technology Corporation (IANA #120)
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Dear Yang Xiaodong,

Please be advised that as of 17 January 2018, Xin Net Technology Corporation ("Xin Net") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 12 December 2013 ("RAA"). This breach results from:

1. Xin Net'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.

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

1. Xin Net'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"), the Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement (RAA) regarding applicable Registration Data Directory Service (Whois) Specifications ("Clarifications") and the Additional Whois Information Policy ("AWIP");
2. Xin Net's failure to display Xin Net's auto-renewal policies on Xin Net's website, as required by Section 3.7.5.5 of the RAA;
3. Xin Net's failure to clearly display on Xin Net's website its renewal fees and post-expiration renewal fees (if different), as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP");

4. Xin Net's failure to provide current documentation demonstrating Xin Net is legally established and in good standing, as required by Section 3.17 and Section 6 of the Registrar Information Specification ("RIS") of the RAA;
5. Xin Net's failure to publish Xin Net's correspondence address on Xin Net's website, as required by Section 3.17 and Section 7 of the RIS of the RAA;
6. Xin Net's failure to publish the full name and position of all officers of the registrar on Xin Net's website, as required by Section 3.17 of the RAA and Section 17 of the RIS of the RAA; and
7. Xin Net's failure to publish Xin Net's ultimate parent entity on Xin Net's website, as required by Section 3.17 and Section 22 of the RIS of the RAA.

Additional Concerns

Based on the information displayed on Xin Net's website, it is unclear whether its delivery of pre- and post-expiration notifications are compliant with Sections 2.1 of the ERRP, which requires these notifications be sent to the Registered Name Holder at specific intervals, including approximately one month and one week prior to expiration, as well as within five days after expiration of the registration.

ICANN requests that Xin Net cure these breaches by 7 February 2018, 21 days from the date of this letter, by taking the following actions:

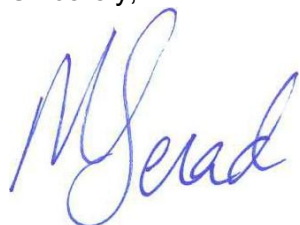
1. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification, Clarifications and AWIP;
2. Publish Xin Net's auto-renewal policies details on Xin Net's website;
3. Clearly display renewal fees and post-expiration renewal fees (if different) on Xin Net's website;
4. Provide ICANN with current documentation demonstrating Xin Net is legally established and in good standing;
5. Publish on Xin Net's website the correspondence address of Xin Net, as specified in the RIS, or, update Xin Net's RIS form to reflect the correspondence address published on Xin Net's website;
6. Publish on Xin Net's website the full name and position of all officers of Xin Net, as specified in the RIS, or, update Xin Net's RIS form to reflect the officer information published on Xin Net's website;
7. Publish Xin Net's ultimate parent entity on Xin Net's website;

8. Confirm Xin Net's expiration reminder notice policy complies with the requirements of the ERRP and publish a policy that is consistent with the ERRP or remove the portions of Xin Net's policy that are inconsistent with the expiration reminder notice requirements of the ERRP;
9. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that:
 - a. Xin Net will timely respond to ICANN compliance matters; and
 - b. Xin Net will timely make payment of its ICANN fees; and
10. Pay all past and currently due accreditation fees.

If Xin Net fails to timely cure the breaches and provide the information requested by 7 February 2018, 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 pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Xin Net owes ICANN past due accreditation fees, in breach of Section 3.9 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. Additional specifications to the format of Whois query responses are contained in the Clarifications and the AWIP. Section 4.1 of the RAA requires registrars to comply with and implement all Consensus Policies, including the AWIP. Xin Net's failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA, Clarifications and AWIP.

Failure to publish auto-renewal policies on website

Section 3.7.5.5 of the RAA requires registrars that operate a website for domain name registration or renewal to clearly display details of the registrar's deletion and auto-renewal policies on the registrar's website. Xin Net's failure to clearly display its auto-renewal policies on its website is a breach of Section 3.7.5.5 of the RAA.

Failure to clearly display renewal fees and post-expiration renewal fees (if different) 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. Xin Net's failure to clearly display its renewal fees and post-expiration renewal fees (if different) on its website is a breach of Section 4.1 of the ERRP.

Failure to provide ICANN with current documentation of legal status

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS, including current documentation demonstrating the registrar entity is legally established and in good standing. Xin Net's failure to provide ICANN with current documentation demonstrating it is legally established and in good standing is a breach of Section 3.17 of the RAA and Section 6 of the RIS.

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. Xin Net's failure to publish its RIS correspondence address on Xin Net's website is a breach of Section 3.17 of the RAA and Section 7 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. Xin Net'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 registrar's 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. Xin Net's failure to publish its ultimate parent entity on Xin Net's 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
7-Mar-2017 22-Mar-2017 5-Apr-2017 14-Nov-2017	N/A	ICANN sent detailed customer statements to Xin Net Technology Corporation regarding past due fees.
13-Dec-2017	20-Dec-2017	ICANN sent 1st compliance notice via email to finance@xinnet.com and admin1@xinnet.com . No response received from Registrar.
21-Dec-2017	5-Jan-2018	ICANN sent 2nd compliance notice via email to finance@xinnet.com . No response received from Registrar.
22-Dec-2017	N/A	ICANN called Primary Contact at +86.1087127991. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [NUMBER REDACTED] and provided complaint details.
7-Jan-2018	15-Jan-2018	ICANN sent 3rd compliance notice via email to finance@xinnet.com and admin1@xinnet.com .
7-Jan-2018	N/A	ICANN sent 3rd compliance notice via fax to +86.1087127010. Fax unsuccessful.

Date of Notice	Deadline for Response	Details
10-Jan-2018	N/A	ICANN called Primary Contact at mobile number [NUMBER REDACTED] and provided complaint details.
11-Jan-2018	N/A	Email received from Registrar (admin1@xinnet.com) insufficient to demonstrate compliance.
11-Jan-2018	15-Jan-2018	ICANN sent follow-up compliance notice via email to finance@xinnet.com and admin1@xinnet.com .
12-Jan-2018	N/A	Email received from Registrar (admin1@xinnet.com) insufficient to demonstrate compliance.
12-Jan-2018	15-Jan-2018	ICANN sent follow-up compliance notice via email to finance@xinnet.com and admin1@xinnet.com .
15-Jan-2018	N/A	Email received from Registrar (admin1@xinnet.com) insufficient to demonstrate compliance.
15-Jan-2018	15-Jan-2018	ICANN sent follow-up compliance notice via email to finance@xinnet.com and admin1@xinnet.com .
16-Jan-2018	N/A	Email received from Registrar (admin1@xinnet.com) insufficient to demonstrate compliance.
16-Jan-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
17-Jan-2018	N/A	To date, the Registrar has not made full payment or responded to ICANN with the requested information and the issue remains unresolved.