



The Internet Corporation for Assigned Names and Numbers

5 February 2015

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Steve Hisey
DropLabel.com, Inc. (IANA #1073)
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Arcadia CA 91006
United States

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RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Mr. Hisey,

Please be advised that as of 5 February 2015, DropLabel.com, Inc. ("DropLabel") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 30 September 2014 ("RAA"). These breaches result from:

1. DropLabel's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA; and
2. DropLabel's failure to maintain accurate and current contact information as specified in the Registrar Information Specification ("RIS"), pursuant to Section 3.17 of the RAA.

Please refer to the attachment for details regarding these breaches.

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

1. Failure to publish the full name and position of all officers of the registrar on DropLabel's website, as required by Section 3.17 and Section 17 of the RIS of the RAA;

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2. Failure to publish an email address to receive abuse reports on the home page of DropLabel's website, as required by Section 3.18.1 of the RAA;
3. Failure to publish a description of DropLabel's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;
4. Failure 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 DropLabel for each top-level domain ("TLD") in which it is accredited, pursuant to Section 3.3.1 of the RAA;
5. Failure to display DropLabel's deletion and auto-renewal policies on DropLabel's website, as required by Section 3.7.5.5 of the RAA; and
6. Failure to clearly display on DropLabel's website, and 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").

ICANN requests that DropLabel cure these breaches by 26 February 2015, 21 calendar days from the date of this letter, by taking the following actions:

1. Immediately 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. Provide ICANN with accurate and current contact information as required by Section 3.17 of the RAA;
3. Publish on DropLabel's website the full name and position of all officers of DropLabel;
4. Publish an email address to receive abuse reports on the home page of DropLabel's website;
5. Publish a description of DropLabel's procedures for the receipt, handling and tracking of abuse reports on DropLabel's website;



6. 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 DropLabel for each TLD in which it is accredited;
7. Publish DropLabel's deletion and auto-renewal policies details on DropLabel's website; and
8. Clearly display renewal fees, post-expiration renewal fees (if different) and redemption/restore fees on DropLabel's website and provide a link to the renewal fees, post-expiration renewal fees (if different) and redemption/restore fees in DropLabel's registration agreement.

If DropLabel fails to timely cure the breaches and provide the information requested by 26 February 2015, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at owen.smigelski@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. DropLabel'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 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. DropLabel's failure to provide to ICANN the requested registrar information 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. DropLabel'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 the RIS.

Failure to publish an email address to receive reports of abuse

Section 3.18.1 of the RAA requires registrars to publish on the home page of their website(s) an email address to receive abuse reports. DropLabel's failure to publish an email address on the home page of its website to receive abuse reports is a breach of Section 3.18 of the RAA.

Failure to publish a description of procedures for receipt, handling and tracking of abuse reports

Section 3.18.3 of the RAA requires registrars to publish on their websites a description of their procedures for the receipt, handling and tracking of abuse reports. DropLabel's failure to publish a description of its procedures for the receipt, handling and tracking of abuse reports on its website is a breach of Section 3.18.3 of the RAA.



Failure to provide an interactive webpage and a port 43 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. DropLabel's failure to provide an interactive webpage and port 43 Whois service is a breach of Section 3.3.1 of the RAA.

Failure to publish deletion and auto-renewal policies on registrar's 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 a registrar's deletion and auto-renewal policies on the registrar's website. DropLabel's failure to clearly display its deletion and auto-renewal policies on its website is a breach of Section 3.7.5.5 of the RAA.

Failure to clearly display a link to renewal fees, post-expiration renewal fees (if different) and 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 agreements. DropLabel's failure to provide a link or clearly display these fees is a breach of Section 4.1 of the ERRP.

Chronology CXL-229-87546 (Data Escrow):

Date of Notice	Deadline for Response	Details
20-Dec-2014	2-Jan-2015	ICANN sent 1st compliance notice via email to stevehisey@gmail.com . No response received from Registrar.
5-Jan-2015	12-Jan-2015	ICANN sent 2nd compliance notice via email to stevehisey@gmail.com . No response received from Registrar.
6-Jan-2015	N/A	ICANN called Primary Contact at mobile number [MOBILE REDACTED]. ICANN provided Registrar representative with complaint details.



Date of Notice	Deadline for Response	Details
13-Jan-2015	21-Jan-2015	ICANN sent 3rd compliance notice via email to stevehisey@gmail.com . No response received from Registrar.
13-Jan-2015	N/A	ICANN sent 3rd compliance notice via fax to +1 626 463 7326. Fax successful.
14-Jan-2015	N/A	ICANN called Primary Contact at mobile number [MOBILE REDACTED]. ICANN provided Registrar representative with complaint details.
4-Feb-2015	N/A	ICANN conducted compliance check to determine other areas of noncompliance
5-Feb-2015	N/A	To date, no response received from Registrar and the issue remains unresolved.

Chronology SAD-307-85490 (RIS):

Date of Notice	Deadline for Response	Details
12-Jan-2015	19-Jan-2015	ICANN sent 1st compliance notice via email to stevehisey@gmail.com . No response received from Registrar.
20-Jan-2015	27-Jan-2015	ICANN sent 2nd compliance notice via email to stevehisey@gmail.com . No response received from Registrar.
22-Jan-2015	N/A	ICANN called Primary Contact at mobile number [MOBILE REDACTED]. ICANN provided Primary Contact with complaint details.
28-Jan-2015	4-Feb-2015	ICANN sent 3rd compliance notice via email to stevehisey@gmail.com . No response received from Registrar.



Date of Notice	Deadline for Response	Details
28-Jan-2015	N/A	ICANN sent 3rd compliance notice via fax to +1 626 463 7326. Fax successful.
2-Feb-2015	N/A	ICANN called Primary Contact at mobile number [MOBILE REDACTED]. ICANN provided Primary Contact with complaint details.
4-Feb-2015	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
5-Feb-2015	N/A	To date, no response received from Registrar and the issue remains unresolved.