



The Internet Corporation for Assigned Names and Numbers

14 November 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Janna Lam  
IP Mirror Pte Ltd dba IP MIRROR (IANA #890)  
9 HongKong Street #01-01  
Singapore 059652  
Singapore

Email: [janna.lam@ipmirror.com](mailto:janna.lam@ipmirror.com)  
Fax: +65 6222 0210

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

Dear Ms. Lam,

Please be advised that as of 14 November 2014, IP Mirror Pte Ltd dba IP MIRROR (“IP Mirror”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 16 September 2013 (“RAA”). These breaches result from:

1. IP Mirror’s failure to review within 24 hours and take necessary and appropriate actions in response to reports of abuse from designated authorities, as required by Section 3.18.2 of the RAA;
2. IP Mirror’s failure to maintain and provide records to ICANN that are related to abuse reports, as required by Section 3.18.3 of the RAA; and
3. IP Mirror’s failure to maintain and make available registration data and records available upon request by ICANN, as required by Sections 3.4.2 and 3.4.3 of the RAA.

Please refer to the attachment for details regarding these breaches.

Los Angeles  
Offices:

12025 Waterfront Drive, Suite 300  
Beijing • Brussels •

Los Angeles, CA 90094 USA  
Istanbul • Montevideo •

T +1 310 301 5800  
• Singapore

F +1 310 823-8649  
• Washington

<http://icann.org>



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

1. Failure to publish an email address to receive abuse reports on the home page of IP Mirror's website, as required by Section 3.18.1 of the RAA;
2. Failure to publish a description of IP Mirror's procedures for the receipt, handling and tracking of abuse reports on its website, as required by Section 3.18.3 of the RAA;
3. Failure to clearly display on IP Mirror'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"); and
4. Failure to provide a policy consistent with the requirements of Section 2.1 of the ERRP to send expiration reminder notices approximately one month and one week prior to expiration and within five days after expiration.

ICANN requests that IP Mirror cure the breaches by 5 December 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide information and records demonstrating that IP Mirror took necessary and appropriate actions in response to the report of abuse associated with the Abuse compliance notices in the chronology below. This includes copies of IP Mirror's correspondence with the abuse reporter and with the Registered Name Holder(s) ("RNHS") of the domain names in the abuse report while investigating the report of abuse (including dates, times, means of inquiries and telephone numbers, e-mail addresses, and postal address used) and the steps your registrar took to address the abuse report;
2. Provide ICANN with a remediation plan, including dates and milestones, to ensure that IP Mirror will monitor 24 hours a day, seven days a week, a dedicated email address and telephone number for receipt of reports of illegal activity from law enforcement, consumer protection, quasi-governmental or other similar authorities designated from time to time by the national or territorial government of the jurisdiction in which IP Mirror is established or maintains a physical office and that well-founded reports of illegal activity submitted to these contacts are being reviewed within 24 hours of receipt by an individual who is empowered by IP Mirror to take necessary and appropriate actions in response to the reports;
3. Publish an email address to receive abuse reports on the home page of IP Mirror's website;



4. Publish a description of IP Mirror's procedures for the receipt, handling and tracking of abuse reports on IP Mirror's website;
5. Clearly display a link to renewal fees, post-expiration renewal fees (if different) and redemption/restore fees on IP Mirror's website and provide a link to the renewal fees, post-expiration renewal fees (if different) and redemption/restore fees in the IP Mirror registration agreement; and
6. Provide ICANN with a remediation plan, including dates and milestones, to ensure that IP Mirror will send expiration reminder notices to the RNHs of domain names that it sponsors at the intervals required by the ERRP.

If IP Mirror fails to timely cure the breaches and provide the information requested by 5 December 2014, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at [owen.smigelski@icann.org](mailto:owen.smigelski@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad", is written over a light blue circular watermark that contains the text "IP MIRROR".

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

## ATTACHMENT

### Failure to review within 24 hours and take necessary and appropriate actions in response to reports of abuse

Section 3.18.2 of the RAA requires registrars to establish and maintain a dedicated abuse point of contact, including a dedicated email address and telephone number that is monitored 24 hours a day, seven days a week, to receive reports of illegal activity by law enforcement consumer protection, quasi-governmental or other similar authorities designated from time to time by the national or territorial government of the jurisdiction in which the registrar is established or maintains a physical office. Well-founded reports of illegal activity submitted to these contacts must be reviewed within 24 hours by an individual who is empowered by the registrar to take necessary and appropriate actions in response to the report. IP Mirror's failure to review the abuse report within 24 hours and take necessary and appropriate actions in response to the abuse report is a breach of Section 3.18 of the RAA.

### Failure to retain registered name holder and registration data and failure to make such data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA requires registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. IP Mirror's failure to provide the requested registration records and data related to the compliance notices detailed in the chronology below is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

### Failure to publish an email address to receive reports of abuse

Section 3.18.1 of the RAA requires registrars to publish an email address to receive abuse reports on the home page of their websites. IP Mirror'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 and to maintain and provide to ICANN records related to abuse reports

Section 3.18.3 of the RAA requires registrars to publish a description of their procedures for the receipt, handling and tracking of abuse reports on their websites. A registrar must also document its receipt of and response to all such reports, as well as maintain the records related to such reports for the shorter of two (2) years or the longest period permitted by applicable law, and during such period, provide such records to ICANN upon reasonable notice. IP Mirror's failure to publish a description of its procedures for the receipt, handling and tracking of abuse reports on its website

and to provide ICANN with records related to the abuse report is a breach of Section 3.18.3 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. IP Mirror’s failure to provide a link or clearly display these fees is a breach of Section 4.1 of the ERRP.

Failure to send expiration reminder notices at required intervals

Section 2.1 of the ERRP requires registrars to notify the RNH of the expiration of a domain name at specific intervals. Pre-expiration reminder notices must be sent 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. IP Mirror’s website posts a policy that does not comply with Section 2.1 of the ERRP and the failure to send expiration reminder notices at the required intervals is a breach of Section 2.1 of the ERRP.

**Chronology:**

Date of Notice	Deadline for Response	Details
12-Sep-2014	19-Sep-2014	ICANN sent 1st compliance notice via email to <a href="mailto:janna.lam@ipmirror.com">janna.lam@ipmirror.com</a> . No response received from Registrar.
22-Sep-2014	29-Sep-2014	ICANN sent 2nd compliance notice via email to <a href="mailto:janna.lam@ipmirror.com">janna.lam@ipmirror.com</a> . No response received from Registrar.
24-Sep-2014	N/A	ICANN called Primary Contact at +65 66710283. Provided Registrar representative with complaint details.

Date of Notice	Deadline for Response	Details
30-Sep-2014	7-Oct-2014	ICANN sent 3rd compliance notice via email to <a href="mailto:janna.lam@ipmirror.com">janna.lam@ipmirror.com</a> .
30-Sep-2014	N/A	ICANN sent 3rd compliance notice via fax to +65 6222 0210. Fax successful.
1-Oct-2014	N/A	ICANN called Primary Contact at +65 66710283. Provided Registrar representative with complaint details.
1-Oct-2014	N/A	Email from Registrar ( <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> ) requesting an extension to respond.
1-Oct-2014	14-Oct-2014	ICANN sent follow up compliance notice via email to <a href="mailto:janna.lam@ipmirror.com">janna.lam@ipmirror.com</a> and <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> granting extension and specifying remaining deficiencies.
10-Oct-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
13-Oct-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
13-Oct-2014	N/A	Email from Registrar ( <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> ) insufficient to demonstrate compliance. Registrar requested additional extension to respond.
13-Oct-2014	14-Oct-2014	ICANN sent follow up compliance notice via email to <a href="mailto:janna.lam@ipmirror.com">janna.lam@ipmirror.com</a> , <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> , and <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> specifying remaining deficiencies.
14-Oct-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
14-Oct-2014	N/A	Email from Registrar ( <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> ) insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
20-Oct-2014	27-Oct-2014	ICANN sent follow up compliance notice via email to <a href="mailto:janna.lam@ipmirror.com">janna.lam@ipmirror.com</a> , <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> and <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> granting extension and specifying remaining deficiencies.
23-Oct-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
25-Oct-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
26-Oct-2014	N/A	Emails from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
26-Oct-2014	N/A	Emails from Registrar ( <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> ) insufficient to demonstrate compliance.
29-Oct-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
4-Nov-2014	N/A	Emails from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
5-Nov-2014	N/A	Emails from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
7-Nov-2014	N/A	Collaboration between Registrar and ICANN Registrar Services to remediate the issue.
7-Nov-2014	N/A	Email from Registrar ( <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> ) insufficient to demonstrate compliance.
7-Nov-2014	N/A	Emails from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.



Date of Notice	Deadline for Response	Details
9-Nov-2014	N/A	Email from Registrar ( <a href="mailto:register@ipmirror.com">register@ipmirror.com</a> ) insufficient to demonstrate compliance.
13-Nov-2014	N/A	Collaboration between Registrar and ICANN Registrar Services to remediate the issue.
14-Nov-2014	N/A	Email from Registrar ( <a href="mailto:jasmine.kwek@ipmirror.com">jasmine.kwek@ipmirror.com</a> ) insufficient to demonstrate compliance.
14-Oct-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
14-Nov-2014	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation.