



The Internet Corporation for Assigned Names and Numbers

2 June 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

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China

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

Dear Mr. Mai,

Please be advised that as of 2 June 2014, Guangdong JinWanBang Technology Investment Co., Ltd. ("GZIDC") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 15 December 2013 ("RAA"). These breaches result from:

1. GZIDC's failure to maintain and make available to ICANN registration records relating to dealings with Registered Name Holders ("RNH") of the domain names <td---fi.com> and <csshangjia.com>, pursuant to Sections 3.4.2 and 3.4.3 of the RAA; and
2. GZIDC's failure to provide AuthInfo codes within five calendar days to the RNHs for the domain names <td---fi.com>, <csshangjia.com>, and <思库.com> (<xn-----dxt27a.com>), pursuant to Section 5 of the Inter---Registrar Transfer Policy ("IRTP").

Please refer to the attachment for details regarding these breaches.

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

1. Failure to provide a description on GZIDC's website of 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");
2. Failure to provide a description on GZIDC's website of methods used to deliver pre-- and post--expiration notifications, as required by Section 4.2 of the ERRP;
3. Failure to display a link to ICANN's Registrant Educational Information webpage, as required by Section 3.16 RAA; and
4. Failure to publish on GZIDC's website the full name, contact information, and position of all officers of the registrar, as required by Section 3.17 and Section 17 of the Registrar Information Specification ("RIS") of the RAA.

ICANN requests that GZIDC cure the breaches by 23 June 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide copies of all written communications, including time--stamped communications, between GZIDC and the RNHs of the domains <td--fi.com> and <csshangjia.com>, including a copy of the registration agreement entered between GZIDC and the RNHs of the accounts;
2. Provide the AuthInfo codes to the RNHs of the domains <td--fi.com>, <csshangjia.com>, and <思库.com>, and unlock the domains for transfer;
3. Clearly display a link to renewal fees, post--expiration renewal fees (if different), and redemption/restore fees on GZIDC's website;
4. Provide a description of methods used to deliver pre-- and post--expiration notifications on GZIDC's website;
5. Clearly display a link to display a link to ICANN's Registrant Educational Information webpage on GZIDC's website; and



6. Clearly publish on GZIDC's website the full names, contact information, and positions of all officers of the registrar.

If GZIDC fails to timely cure the breaches and provide the information requested by 23 June 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 horizontal line.

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



## ATTACHMENT

### 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 registered name holder and registration data, and to make those records available to ICANN upon reasonable notice. As detailed in the three chronologies below, since April 2014 ICANN sent GZIDC multiple notices requesting registration data and records. To date, GZIDC has not provided these documents.

### Failure to provide AuthInfo Codes within five calendar days

Paragraph 5 of the IRTP requires registrars to provide the RNH with the unique AuthInfo code within five (5) calendar days of the RNH's initial request. Registrars may only deny a transfer request for the reasons listed in Section 3 of the IRTP.

GZIDC did not provide the AuthInfo codes to the RNHs within 5 days from the date of the initial requests for the domain names <td---fi.com>, <csshangjia.com>, and <思库.com>. GZIDC did not deny the transfers for the reasons listed in Section 3 of the IRTP. GZIDC's failure to provide the AuthInfo code within five (5) days of the Registered Name Holders' requests concerning domain names <td---fi.com>, <csshangjia.com>, and <思库.com> constitutes a breach of Section 5 of the IRTP.

### 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 registered name holders and prospective registered name holders 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. GZIDC's website does not provide a link or clearly display these fees in breach of Section 4.1 of the ERRP.

### Failure to describe on their websites (if used) the methods used to deliver pre--- and post---expiration notifications

Section 4.2 of the ERRP requires registrars to describe on their websites (if used) the methods used to deliver pre--- and post---expiration notifications for renewal of domain registrations. The website of GZIDC does not describe these notifications in breach of Section 4.2 of the ERRP.



### Failure to Display a Link to ICANN's Registrant Education Information Webpage

Section 3.16 of the RAA requires registrars to clearly display a link to ICANN's Registrant Educational Information webpage on GZIDC's website. GZIDC's website does not provide a link to ICANN's Registrant Educational Information webpage in breach of Section 3.16 of the RAA.

### Failure to Publish Officer Information on Registrar's Website

Section 3.17 of the RAA requires registrars to provide to ICANN and maintain accurate and current information as specified in the RIS of the RAA. In addition, a registrar must publish on each website through which a registrar provides or offers registrar services, the information specified as requiring publication in the RIS. The RIS requires registrars to publish the full name, contact information, and position of all officers of the registrar on its website. GZIDC's failure to publish the full name, contact information, and position of all its officers on its website, is a violation of Section 3.17 of the RAA and the RIS.

### **Chronology:**

TICKET ID: WTD---466---81650 <td---fi.com>

Date of Notice	Deadline for Response	Details
1---Apr---2014	8---Apr---2014	ICANN sent 1st compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> . No response received from Registrar.
9---Apr---2014	16---Apr---2014	ICANN sent 2nd compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> . No response received from Registrar.
21---Apr---2014	N/A	ICANN called Primary Contact at +86 20 6684 9066. No answer. No option to leave a voice message. ICANN then called Primary Contact's mobile at (REDACTED). Telephone was turned off.
3---May---2014	9---May---2014	ICANN sent 3rd compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> and <a href="mailto:maich@gzidc.com">maich@gzidc.com</a> .



Date of Notice	Deadline for Response	Details
3---May---2014	N/A	The 3rd compliance notice was faxed to + 86 20 6684 9015. Fax successful.
5---May---2014	N/A	ICANN called Primary Contact's mobile at (REDACTED). No answer. No option to leave a voice message.
27---May---2014	N/A	ICANN conducted check to determine other areas of noncompliance.
2---June---2014	N/A	Requested documentation not received.

TICKET ID: GUS---862---10804 <csshangjia.com>

Date of Notice	Deadline for Response	Details
14---Apr---2014	21---Apr---2014	ICANN sent 1st compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> . No response received from Registrar.
21---Apr---2014	N/A	ICANN called Primary Contact at +86 20 6684 9066. No answer. No option to leave a voice message. ICANN then called Primary Contact's mobile at (REDACTED). Telephone was turned off.
24---Apr---2014	1---May---2014	ICANN sent 2nd compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> . No response received from Registrar.
30---Apr---2014	N/A	ICANN called Primary Contact at +86 20 6684 9066. No answer. No option to leave a voice message.

Date of Notice	Deadline for Response	Details
5---May---2014	12---May---2014	ICANN sent 3rd compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> and <a href="mailto:maich@gzidc.com">maich@gzidc.com</a> .
5---May---2014	N/A	The 3rd compliance notice was faxed to + 86 20 6684 9015. Fax successful.
5---May---2014	N/A	ICANN called Primary Contact's mobile at (REDACTED). No answer. No option to leave a voice message.
9---May---2014	N/A	Email from Registrar ( <a href="mailto:yaohy@gzidc.com">yaohy@gzidc.com</a> ) advising ICANN that the AuthInfo code had been sent to the RNH. Registrar did not provide supporting documentation, and the transfer was not completed.
16---May---2014	23---May---2014	ICANN sent a follow---up notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> requesting a copy of the written communication demonstrating that the AuthInfo code had been sent to the RNH. No response received from Registrar.
20---May---2014	N/A	ICANN called Primary Contact at +86 20 6684 9066. No answer. No option to leave a voice message. ICANN then called Primary Contact's mobile at (REDACTED). No answer. No option to leave a voice message.
27---May---2014	N/A	ICANN conducted check to determine other areas of noncompliance.
2---June---2014	N/A	Requested documentation not received.



TICKET ID: YIB--665--85087 <思库.com>

Date of Notice	Deadline for Response	Details
8--Apr--2014	15--Apr--2014	ICANN sent 1st compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> . No response received from Registrar.
16--Apr--2014	23--Apr--2014	ICANN sent 2nd compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> . No response received from Registrar.
21--Apr--2014	N/A	ICANN called Primary Contact at +86 20 6684 9066. No answer. No option to leave a voice message. ICANN then called Primary Contact's mobile at (REDACTED). Telephone was turned off.
6--May--2014	13--May--2014	ICANN sent 3rd compliance notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> and <a href="mailto:maich@gzidc.com">maich@gzidc.com</a> .
6--May--2014	N/A	The 3rd compliance notice was faxed to + 86 20 6684 9015. Fax unsuccessful.
9--May--2014	N/A	Email from Registrar ( <a href="mailto:yaohy@gzidc.com">yaohy@gzidc.com</a> ) advising ICANN that the Registrar did not provide the AuthInfo Code to the RNH because the RNH did not comply with request to provide further proof of ID. Registrar attached a copy of the communications in which the Registrar requested the RNH to provide a picture of the RNH holding the ID as a condition to provide the AuthInfo Code.
16--May--2014	23--May--2014	ICANN sent a follow--up notice via email to <a href="mailto:chenxiaojun@gzidc.com">chenxiaojun@gzidc.com</a> requesting further explanation regarding the ID verification requirements imposed by the Registrar as a condition to provide the AuthInfo Code to the RNH. No response received from Registrar.
20--May--2014	N/A	ICANN called Primary Contact at +86 20 6684 9066. No answer. No option to leave a voice message. ICANN then called Primary Contact's mobile at (REDACTED). No answer. No option to leave a voice message.
27 May--2014	N/A	ICANN conducted check to determine other areas of non--compliance.





<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
2--June--2014	N/A	Requested documentation not received.