

22 December 2021

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

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

[REDACTED]  
Threadagent.com, Inc. (IANA #1019)  
[REDACTED]

Email: [REDACTED]  
Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 22 December 2021, Threadagent.com, Inc. (“Threadagent.com” or “Registrar”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 24 January 2021 (“RAA”). This breach results from:

1. Threadagent.com’s failure to comply with the Uniform Domain Name Dispute Resolution Policy (“UDRP”) and the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), as required by Section 3.8 of the RAA; and
2. Threadagent.com’s failure to provide and maintain accurate and current information as specified in the Registrar Information Specification (“RIS”), as required by Section 3.17 of the RAA.

Please refer to the attachment for details regarding these breaches.

In addition, Threadagent.com has been deemed noncompliant in the following areas:

3. Threadagent.com’s failure to provide an interactive web page providing free public query-based access to up-to-date data concerning all active registered names sponsored for each top-level domain (“TLD”) in which it is accredited.
4. Threadagent.com’s failure to escrow gTLD registration data, as required by Section 3.6 of the RAA.

### Additional Concerns

During the complaint process, Threadagent.com has either been non-responsive or has provided responses that have regularly been untimely and incomplete following additional reminders through telephone calls from ICANN Contractual Compliance staff. Further, the Registrar demonstrated the same pattern of incomplete and untimely responses to the UDRP Complainant's representative's requests.

ICANN requests that Threadagent.com cure these breaches by 12 January 2022, 21 days from the date of this letter, by taking the following actions:

1. Concerning the UDRP Administrative Panel's decision Case No. D2021-1573 ("Decision"):
  - a. Implement the Decision in the terms prescribed by Paragraph 4(k) of the UDRP, provide evidence that this has been done and that the Complainant has been assisted.
  - b. Provide copies of the correspondence in which Threadagent.com communicated to ICANN, the Provider and the Parties the date for the implementation of the Decision, as required by Paragraph 16(a) of the Rules; and
  - c. Explain the reasons why the Decision was ultimately not timely implemented, and provide the specific measures, with implementation date(s), taken by the Registrar to prevent this instance of noncompliance from recurring.
2. Provide an interactive webpage Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by Threadagent.com for each TLD in which it is accredited.
3. Provide ICANN with a completed RIS form, including accurate and current information, the required supporting documentation and the location of any applicable information published on Threadagent.com's website, as required by Section 3.17 of the RAA.
4. Deposit gTLD registration data on a weekly basis to an approved escrow agent and ensure that the deposits meet the required specifications.
5. Provide ICANN with the corrective and preventative action(s) that Threadagent.com will take, with implementation date(s), to address its pattern of untimely, incomplete and non-response to ICANN Contractual Compliance matters.

If Threadagent.com fails to timely cure the breaches and provide the information requested by 12 January 2022, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at [REDACTED].

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund  
Senior Vice President, Contractual Compliance and Consumer Safeguards  
Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary

## ATTACHMENT

### Failure to comply with the UDRP and UDRP Rules

Section 3.8 RAA requires registrars to comply with the UDRP. Paragraph 4(k) of the UDRP mandates that registrars implement UDRP decisions within ten (10) business days of having being informed by the applicable Provider, unless the relevant registrar received from the Respondent official documentation that the Respondent commenced a lawsuit against the Complainant in a jurisdiction to which the Complainant has submitted under Paragraph 3(b)(xiii) of the UDRP Rules. Threadagent.com's failure to (1) timely implement the Decision rendered in Case No. D2021-1573; or (2) provide evidence of having received official documentation with respect to the commencement of a lawsuit, is a breach of Section 3.8 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. Threadagent.com's failure to provide to ICANN and maintain accurate and current information as specified in the RIS, is a breach of Section 3.17 of the RAA.

### Failure to provide an interactive webpage 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. Threadagent.com's failure to provide an interactive web-based Whois service is a breach of Section 3.3.1 of the RAA.

### 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. Threadagent.com's failure to made the deposit that was due on 17 December 2021 is a breach of Section 3.6 of the RAA.

## CHRONOLOGIES

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified Threadagent.com of the violations associated with the cases, including the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from Threadagent.com to become compliant. All inquiries/notices subsequent to each 1st inquiry/notice constituted an additional attempt by ICANN to obtain evidence of compliance from the Registrar. All telephone call details below described further attempts from ICANN to communicate to the Registrar the details of the cases and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist Threadagent.com in becoming compliant. All these attempts were unsuccessful.

**Chronology (Case# 01072364):**

Date of Notice	Deadline for Response	Details
21-Sep-2021	28-Sep-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
15-Oct-2021	22-Oct-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
18-Oct-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
18-Oct-2021	22-Oct-2021	Upon the Registrar's request, ICANN re-sent 2nd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED].
19-Oct-2021	N/A	Response from the Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
19-Oct-2021	22-Oct-2021	ICANN sent a follow-up to the 2nd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
29-Oct-2021	4-Nov-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED].
29-Oct-2021	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
1-Nov-2021	N/A	Response from the Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
1-Nov-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
21-Dec-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
22-Dec-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation, and the issue remains unresolved.

**Chronology (Case #01038493):**

Date of Notice	Deadline for Response	Details
4-May-2021	11-May-2021	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from the Registrar.
12-May-2021	19-May-2021	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from the Registrar.

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
17-May-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
17-May-2021	19-May-2021	Upon the Registrar's request, ICANN re-sent the 2nd compliance inquiry via email to [EMAIL REDACTED] and [EMAIL REDACTED].
19-May-2021	N/A	Email from the Registrar ([EMAIL REDACTED]) with a request to extend the deadline to demonstrate compliance.
20-May-2021	27-May-2021	ICANN sent a follow-up to the 2nd compliance inquiry via email to [EMAIL REDACTED] and [EMAIL REDACTED], confirming the deadline extension.
7-Jun-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Jun-2021	N/A	Email from the Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
17-Jun-2021	24-Jun-2021	ICANN sent a follow-up to the 2nd compliance inquiry via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
19-Jul-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
3-Sep-2021	10-Sep-2021	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
3-Sep-2021	N/A	ICANN sent 3rd compliance inquiry via fax to [FAX REDACTED]. Fax unsuccessful.
8-Sep-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
14-Sep-2021	21-Sep-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
23-Sep-2021	30-Sep-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.
28-Sep-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
9-Dec-2021	16-Dec-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
9-Dec-2021	N/A	ICANN sent 3rd compliance notice via fax to [REDACTED]. Fax unsuccessful.
14-Dec-2021	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
21-Dec-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
22-Dec-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation, and the issue remains unresolved.