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17 January 2018

#### TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

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

Murat Yaniklar Reg2C.com Inc. (IANA #819) Esentepe Mah Talatpasa Cad. Oto Cikmazi Sok No:4 Kat:1 Daire:6 Sisli Istanbul Turkey

Email: reg2c@turkticaret.net Fax: +90 224 224 9520

Dear Murat Yaniklar,

Please be advised that as of 17 January 2018, Reg2C.com Inc. ("Reg2C.com") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 13 September 2014 ("RAA"). This breach results from:

1. Reg2C.com'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, Reg2C.com has been deemed noncompliant in the following areas:

- Reg2C.com's failure to publish on Reg2C.com's website(s) and/or provide a link on its website to the Registrants' Benefits and Responsibilities Specification, as required by Section 3.7.10 of the RAA;
- 2. Reg2C.com's failure to publish an email address to receive abuse reports on the home page of Reg2C.com's website, as required by Section 3.18.1 of the RAA; and
- Reg2C.com's failure to publish on its website a description of Reg2C.com's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA.

# **Additional Concerns**

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. The information on Reg2C.com's website regarding its deletion and auto-renewal policies is unclear.



ICANN requests that Reg2C.com cure these breaches by 7 February 2018, 21 days from the date of this letter, by taking the following actions:

- 1. Publish on Reg2C.com's website(s) and/or provide a link on its website to the Registrants' Benefits and Responsibilities Specification;
- 2. Publish an email address to receive abuse reports on the home page of Reg2C.com's website:
- 3. Publish a description of Reg2C.com's procedures for the receipt, handling and tracking of abuse reports on Reg2C.com's website;
- 4. Clarify Reg2C.com's deletion and auto-renewal policies, and provide the location of the details of these policies on Reg2C.com's website;
- 5. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that:
  - a. Reg2C.com will timely respond to ICANN compliance matters; and
  - b. Reg2C.com will timely make payment of its ICANN fees; and
- 6. Pay all past and currently due accreditation fees.

If Reg2C.com 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 <a href="mailto:jennifer.scott@icann.org">jennifer.scott@icann.org</a>.

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. Reg2C.com owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

<u>Failure to publish on Reg2C.com's website(s) and/or provide a link to the Registrants' Benefits and Responsibilities Specification</u>

Section 3.7.10 of the RAA requires registrars to publish on its website(s) and/or provide a link on its website to the Registrants' Benefits and Responsibilities Specification attached to the RAA. Reg2C.com's failure to publish on its website or provide a link on its website to the Registrants' Benefits and Responsibilities Specification is a breach of Section 3.7.10 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 on the home page of their website an email address to receive abuse reports. Reg2C.com's failure to publish an email address on the home page of its website to receive abuse reports is a breach of Section 3.18.1 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 website a description of their procedures for the receipt, handling and tracking of abuse reports. Reg2C.com'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.

## **Chronology:**

Date of Notice	Deadline for Response	Details
21-Jul-2017 8-Aug-2017 23-Aug-2017 14-Nov-2017	N/A	ICANN sent detailed customer statements to Reg2C.com Inc. regarding past due fees.
13-Dec-2017	20-Dec-2017	ICANN sent 1st compliance notice via email to <a href="mailto:info@reg2c.com">info@reg2c.com</a> and <a href="mailto:reg2c@turkticaret.net">reg2c@turkticaret.net</a> . No response received from Registrar.
21-Dec-2017	5-Jan-2018	ICANN sent 2nd compliance notice via email to <a href="mailto:info@reg2c.com">info@reg2c.com</a> and <a href="mailto:reg2c@turkticaret.net">reg2c@turkticaret.net</a> . No response received from Registrar.



Date of Notice	Deadline for Response	Details
22-Dec-2017	N/A	ICANN called Primary Contact at +90 534 386 1687. No answer and no ability to leave a voicemail. ICANN called Primary Contact at +90 224 224 8640 and provided Registrar Representative with complaint details.
3-Jan-2018	N/A	ICANN called Primary Contact at +90 224 224 8640 and +90 534 386 1687. No answer and no ability to leave a voicemail.
4-Jan-2018	N/A	ICANN called Primary Contact at +90 224 224 8640 and provided Registrar Representative with complaint details.
7-Jan-2018	15-Jan-2018	ICANN sent 3rd compliance notice via email to <a href="mailto:info@reg2c.com">info@reg2c.com</a> and <a href="mailto:reg2c@turkticaret.net">reg2c@turkticaret.net</a> .
7-Jan-2018	N/A	ICANN sent 3rd compliance notice via fax to +90 224 224 9520. Fax unsuccessful.
10-Jan-2018	N/A	Email received from Registrar (gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.
10-Jan-2018	N/A	ICANN called Primary Contact at +90 224 224 8640, +90 534 386 1687 and at mobile number [NUMBER REDACTED]. No answer and no ability to leave a voicemail.
11-Jan-2018	15-Jan-2018	ICANN sent follow-up compliance notice via email to info@reg2c.com, reg2c@turkticaret.net and gozde.demirkol@turkticaret.net.
15-Jan-2018	N/A	Emails received from Registrar (gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.
15-Jan-2018	15-Jan-2018	ICANN sent follow-up compliance notices via email to info@reg2c.com, reg2c@turkticaret.net and gozde.demirkol@turkticaret.net.
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.