

11 October 2021

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

[REDACTED]
Alice's Registry, Inc. (IANA #275)
[REDACTED]

Email: [REDACTED]
Fax: [REDACTED]

Dear [REDACTED],

Please be advised that as of 11 October 2021, Alice's Registry, Inc ("Alice's Registry") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 17 October 2020 ("RAA"). This breach results from:

1. Alice's Registry'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, Alice's Registry has been deemed noncompliant in the following areas:

2. Alice's Registry's failure to provide an interactive web page and port 43 Whois service 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.

Additional Concerns

As detailed in the chronologies below, Alice's Registry's last known written response to ICANN Contractual Compliance was 21 August 2020. Several attempts were made to contact Alice's Registry's Primary Contact throughout the process, and in April 2020, the Primary Contact indicated over the telephone consideration of shutting down the registrar business. Currently, it is unclear if the Primary Contact telephone numbers remain in service and the registrar's website no longer appears to be resolving. Additionally, ICANN Contractual Compliance notes the registrar's business entity may be suspended.

As a result, in conjunction with port 43, Alice's Registry is not providing an interactive webpage with free public query-based access to up-to-date data, also known as Registration Data Directory Service ("RDDS"), concerning all active registered names sponsored by the Registrar for all top-level domains ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA.

Moreover, due to Alice's Registry's failure to follow through on responses to inquiries and notices, and despite several extensions granted by ICANN through the compliance ticket SKZ-258-59614, ICANN is unable to currently confirm whether Alice's Registry has implemented a Registration Data Access Protocol ("RDAP") service as required by the Whois Specification and the Interim Registration Data Policy for gTLDs (requiring Alice's Registry to continue to implement measures consistent with the Temporary Specification for gTLD Registration Data).

ICANN requests that Alice's Registry cure these breaches by 1 November 2021, 21 days from the date of this letter, by taking the following actions:

1. Pay all past and currently due accreditation fees.
2. 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 Alice's Registry for each TLD in which it is accredited.
3. Provide ICANN with evidence of having implemented an RDAP service and register your registrar's RDAP Base URL through the Naming Services portal (NSp).
4. Provide certificate of good standing as required by Section 3.17 of the RAA and Section 6 of the Registrar Information Specification ("RIS") of the RAA.

If Alice's Registry fails to timely cure the breaches and provide the information requested by 1 November 2021, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Jonathan Denison 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 pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Alice's Registry owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

CHRONOLOGIES

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified Alice's Registry of the violations associated with the case, including the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from Alice's Registry 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 Alice's Registry in becoming compliant. All these attempts were unsuccessful.

Chronology (Case #UWN-708-76192):

Date of Notice	Deadline for Response	Details
23-May-2020 9-Jun-2020 23-Jun-2020 7-Jul-2020 22-Jul-2020 6-Aug-2020	N/A	ICANN sent detailed customer statements to Alice's Registry, Inc. regarding past due fees.
18-Aug-2020	N/A	Alice's Registry, Inc.'s past due fees were referred to ICANN Contractual Compliance.
15-Sep-2020	22-Sep-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.
28-Sep-2020	5-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.
7-Oct-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.

Date of Notice	Deadline for Response	Details
13-Oct-2020	20-Oct-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.
13-Oct-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax successful.
13-Oct-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
11-Oct-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
11-Oct-2021	N/A	To date, the Registrar has not made full payment of past due fees and the issue remains unresolved.

Chronology (Case #SKZ-258-59614):

Date of Inquiry/Notice	Deadline for Response	Details
15-Oct-2019	22-Oct-2019	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED].
16-Oct-2019	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
16-Oct-2019	N/A	ICANN confirmed receipt of Registrar's response via email to [EMAIL REDACTED].
21-Nov-2019	28-Nov-2019	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
6-Dec-2019	13-Dec-2019	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED].
19-Dec-2019	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and provided Primary Contact with complaint details.

19-Dec-2019	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
6-Jan-2020	13-Jan-2020	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED].
6-Jan-2020	13-Jan-2020	ICANN re-sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from the Registrar.
4-Feb-2020	N/A	ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
6-Feb-2020	13-Feb-2020	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
12-Feb-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a message. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
11-Mar-2020	18-Mar-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
16-Apr-2020	23-Apr-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
16-Apr-2020	N/A	ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and provided Primary Contact with complaint details.
13-May-2020	20-May-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
14-May-2020	N/A	ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
5-June-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
6-Aug-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a message. ICANN called Primary Contact at mobile number

		[TELEPHONE REDACTED] and left voicemail with complaint details.
26-Aug-2020	N/A	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
10-Mar-2021	N/A	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registrar.
11-Oct-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
11-Oct-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.