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8 June 2018

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

### RE: NOTICE OF BREACH OF REGISTRY AGREEMENT

[NAME REDACTED]
Tata Motors Ltd (tatamotors)
[ADDRESS REDACTED]
IN

Email: [EMAIL REDACTED]
Fax: [NUMBER REDACTED]

Dear [NAME REDACTED],

Please be advised that as of 8 June 2018, Tata Motors Ltd ("Tata Motors") is in breach of its Registry Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 12 March 2015 ("RA"). This breach results from:

1. Tata Motors' failure to timely pay past due fees, as required by Article 6 of the RA.

Please refer to the attachment for details regarding this breach.

In addition, Tata Motors has been deemed noncompliant in the following area:

1. Tata Motors' failure to publish on its website abuse contact details, including a valid mailing address for handling inquiries related to malicious conduct in the TLD tatamotors, as required by Section 4.1 of Specification 6 of the RA.

ICANN requests that Tata Motors cure these breaches by 8 July 2018, 30 days from the date of this letter, by taking the following actions:

- 1. Publish on Tata Motors' website its accurate contact details, including a valid mailing address, for handling inquiries related to malicious conduct in the TLD tatamotors.
- 2. Provide ICANN with the corrective and preventative action(s) that Tata Motors will take, with implementation date(s), to ensure:
  - a. timely payment of fees to ICANN; and
  - b. timely and complete response to ICANN Contractual Compliance matters; and
- 3. Pay all past and currently due fees.



If Tata Motors fails to timely cure the breaches and provide the information requested by 8 July 2018, ICANN may commence the RA termination process.

If you have questions or require assistance, please contact Jennifer Scott at jennifer.scott@icann.org.

Sincerely, [SIGNATURE REDACTED] Maguy Serad Vice President Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



#### ATTACHMENT

## Failure to pay fees

Article 6 of the RA requires registry operators to pay Registry-Level Fees on a quarterly basis within 30 calendar days following the date of the invoice provided by ICANN. Tata Motors owes ICANN past due fees, in breach of Article 6 of the RA.

## Failure to publish abuse contact information on website

Section 4.1 of Specification 6 of the RA requires registry operators to provide to ICANN and publish on its website its accurate contact details including a valid email and mailing address, as well as a primary contact, for handling inquiries related to malicious conduct in the TLD, and provide ICANN with prompt notice of any changes to such contact details. Tata Motors' failure to publish a valid abuse contact mailing address on its website for TLD tatamotors is a breach of Section 4.1 of Specification 6 of the RA.

# **Chronology:**

Date of Notice	Deadline for Response	Details
15-Nov-2017 15-Dec-2017 9-Jan-2018	N/A	ICANN sent detailed customer statements to Tata Motors Ltd regarding past due fees.
1-May-2018	N/A	Tata Motors' past due fees were referred to ICANN Contractual Compliance.
10-May-2018	17-May-2018	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] No response received from Registry Operator.
22-May-2018	29-May-2018	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]
23-May-2018	N/A	Email received from Registry Operator [EMAIL REDACTED] insufficient to demonstrate compliance.
28-May-2018	N/A	Emails received from Registry Operator [EMAIL REDACTED] and [EMAIL REDACTED] insufficient to demonstrate compliance.
29-May-2018	N/A	ICANN called Compliance Contact at [NUMBER REDACTED] and left voicemail with complaint details.
31-May-2018	7-June-2018	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registry Operator.
31-May-2018	N/A	ICANN sent 3rd compliance notice via fax to [NUMBER REDACTED]. Fax unsuccessful.
1-June-2018	N/A	ICANN called Compliance Contact at [NUMBER REDACTED] and left voicemail with complaint details. ICANN called Compliance Contact at mobile number [NUMBER REDACTED] and provided Compliance Contact with complaint details.



Date of Notice	Deadline for Response	Details
7-Jun-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
8-Jun-2018	N/A	To date, the Registry Operator has not made full payment or responded to ICANN with the requested information and the issue remains unresolved.