

14 February 2019

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Alex Zhou and Jian Peng Zhang Beijing Aidi Tong Lian Technology, LLC. (IANA #3781) Room 404, Building D, Jinyu Jia Hua Masion, Shangdi No. 3 Street Haidian District, Beijing China

Email: domain@zhujiwu.com and zjp@zhujiwu.com

Fax: +86 01051661870 x100

Dear Alex Zhou and Jian Peng Zhang,

Please be advised that as of 14 February 2019, Beijing Aidi Tong Lian Technology, LLC. ("Beijing Aidi Tong Lian Technology") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 18 July 2017 ("RAA"). This breach results from:

1. Beijing Aidi Tong Lian Technology'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, Beijing Aidi Tong Lian Technology has been deemed noncompliant in the following areas:

- Beijing Aidi Tong Lian Technology's failure to publish on registrar'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. Beijing Aidi Tong Lian Technology's failure to publish an email address to receive abuse reports on the home page of registrar's website, as required by Section 3.18.1 of the RAA;
- 3. Beijing Aidi Tong Lian Technology's failure to publish on its website a description of registrar's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;
- 4. Beijing Aidi Tong Lian Technology's failure to display the correct ICANN logo on registrar's website, as required by the Logo License Specification of the RAA;



- 5. Beijing Aidi Tong Lian Technology's failure to provide on registrar's website, a description of the methods used to deliver pre- and post-expiration notifications, as required by Section 4.2 of the Expired Registration Recovery Policy ("ERRP");
- 6. Beijing Aidi Tong Lian Technology's failure to publish its correspondence address on registrar's website, as required by Section 3.17 and Section 7 of the Registrar Information Specification ("RIS") of the RAA;
- 7. Beijing Aidi Tong Lian Technology's failure to publish the full name and position of all officers of the registrar on registrar's website, as required by Section 3.17 of the RAA and Section 17 of the RIS of the RAA; and
- Beijing Aidi Tong Lian Technology's failure to complete and deliver to ICANN a
 Compliance Certificate within twenty (20) days following the end of the 2018 calendar
 year, certifying compliance with the terms and conditions of the RAA, as required by
 Section 3.15 of the RAA.

Additional Concerns

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS, including a registrar's ultimate parent entity (see Section 22 of the RIS). There is information published on Beijing Aidi Tong Lian Technology's website to suggest it has an ultimate parent entity, which was not included in its RIS form. There is also information to suggest that Beijing Aidi Tong Lian Technology's contact information with ICANN is out of date.

ICANN requests that Beijing Aidi Tong Lian Technology cure these breaches by 7 March 2019, 21 days from the date of this letter, by taking the following actions:

- 1. Publish on Beijing Aidi Tong Lian Technology'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 Beijing Aidi Tong Lian Technology's website;
- Publish a description of Beijing Aidi Tong Lian Technology's procedures for the receipt, handling and tracking of abuse reports on Beijing Aidi Tong Lian Technology's website;
- 4. Display the correct ICANN logo on Beijing Aidi Tong Lian Technology's website in accordance with the Logo License Specification of the RAA, or remove the ICANN logo from Beijing Aidi Tong Lian Technology's website;
- 5. Provide a description of the methods used to deliver pre- and post-expiration notifications on Beijing Aidi Tong Lian Technology's website;
- 6. Publish on Beijing Aidi Tong Lian Technology's website the correspondence address of Beijing Aidi Tong Lian Technology, as specified in the RIS, or, update Beijing Aidi Tong



Lian Technology's RIS form to reflect the correspondence address published on Beijing Aidi Tong Lian Technology's website;

- 7. Publish on Beijing Aidi Tong Lian Technology's website the full name and position of all officers of Beijing Aidi Tong Lian Technology, as specified in the RIS;
- 8. Confirm whether Beijing Aidi Tong Lian Technology has an ultimate parent entity (as indicated on its website) and, if so, update Beijing Aidi Tong Lian Technology's RIS form to reflect the ultimate parent entity published on Beijing Aidi Tong Lian Technology's website;
- After curing all items in this notice of breach, provide a certificate executed by the
 president, chief executive officer, chief financial officer or chief operating officer (or their
 equivalents) of Beijing Aidi Tong Lian Technology certifying compliance with the terms
 and conditions of the RAA ("compliance certificate");
- 10. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure:
 - a. Beijing Aidi Tong Lian Technology's contact information with ICANN is up to date:
 - b. timely and complete responses to ICANN Contractual Compliance matters; and
 - c. timely payment of ICANN fees; and
- 11. Pay all past and currently due accreditation fees.

If Beijing Aidi Tong Lian Technology fails to timely cure the breaches and provide the information requested by 7 March 2019, ICANN may commence the RAA termination process.

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

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. Beijing Aidi Tong Lian Technology owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA. Beijing Aidi Tong Lian Technology additionally owes currently due accreditation fees, due 14 February 2019 and 2 March 2019.

Failure to publish on Beijing Aidi Tong Lian Technology's website(s) and/or provide a link to the Registrants' Benefits and Responsibilities Specification

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. Beijing Aidi Tong Lian Technology'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. Beijing Aidi Tong Lian Technology'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. Beijing Aidi Tong Lian Technology'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.

Failure to display correct ICANN-Accredited Registrar logo

The Logo License Specification of the RAA requires registrars, if displaying the ICANN-Accredited Registrar logo, to use the logo displayed in the specification. Beijing Aidi Tong Lian Technology's use of an unapproved logo is a breach of the Logo License Specification of the RAA.

Failure to describe 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), and include in their registration agreements a description of its notification methods or a link to the applicable page(s) on their websites where this information is available, the methods used to deliver pre- and post-expiration notifications for renewal of domain registrations. Beijing Aidi



Tong Lian Technology's failure to describe these notifications on its website is a breach of Section 4.2 of the ERRP.

Failure to publish registrar's correspondence address on registrar's website

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. In addition, registrars must publish on each website through which it provides or offers registrar services, the information specified in the RIS as requiring publication. Beijing Aidi Tong Lian Technology's failure to publish its RIS correspondence address on its website is a breach of Section 3.17 of the RAA and Section 7 of the RIS.

Failure to publish the full name and position of all officers on registrar's website

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. In addition, registrars must publish on each website through which it provides or offers registrar services, the information specified in the RIS as requiring publication. Beijing Aidi Tong Lian Technology's failure to publish the full name and position of its officers, as specified in its RIS, on its website is a breach of Section 3.17 of the RAA and Section 17 of the RIS.

Failure to submit to ICANN annual compliance certificate

Section 3.15 of the RAA requires registrars to complete and deliver to ICANN within twenty (20) days following the end of each calendar year, in a form specified by ICANN, a certificate executed by the president, chief executive officer, chief financial officer or chief operating officer (or their equivalents) of the registrar certifying compliance with the terms and conditions of the RAA. Beijing Aidi Tong Lian Technology's failure to complete and deliver the compliance certificate for 2018 is a breach of Section 3.15 of the RAA.

Chronology:

Date of Notice	Deadline for Response	Details
21-Nov-2018 6-Dec-2018 21-Dec-2018	N/A	ICANN sent detailed customer statements to Beijing Aidi Tong Lian Technology regarding past due fees.
18-Jan-2019	N/A	Beijing Aidi Tong Lian Technology's past due fees were referred to ICANN Contractual Compliance.
19-Jan-2019	28-Jan-2019	ICANN sent 1st compliance notice via email to domain@zhujiwu.com and zjp@zhujiwu.com . No response received from Registrar.
29-Jan-2019	5-Feb-2019	ICANN sent 2nd compliance notice via email to domain@zhujiwu.com and zjp@zhujiwu.com . No response received from Registrar.



Date of Notice	Deadline for Response	Details
29-Jan-2019	N/A	ICANN called Primary Contact at +86 01051661870 x819 and provided Registrar Representative with complaint details.
6-Feb-2019	13-Feb-2019	ICANN sent 3rd compliance notice via email to domain@zhujiwu.com and zjp@zhujiwu.com . No response received from Registrar.
6-Feb-2019	N/A	ICANN sent 3rd compliance notice via fax to +86 01051661870. Fax unsuccessful.
7-Feb-2019	N/A	ICANN called Primary Contact at +86 01051661870 and provided Registrar Representative with complaint details.
11-Feb-2019	N/A	ICANN called Primary Contact at +86 01051661870. No answer and no ability to leave a voicemail.
13-Feb-2019	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
14-Feb-2019	N/A	To date, the Registrar has not made full payment of past due fees and the issue remains unresolved.