



7 December 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRY AGREEMENT

[REDACTED]
Atgron, Inc. (wed)
[REDACTED]

Email: [EMAIL REDACTED]
Fax: [FAX REDACTED]

Dear [REDACTED],

Please be advised that as of 7 December 2017, Atgron, Inc. ("Atgron") is in breach of its Registry Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 1 October 2013 ("RA"). These breaches result from:

1. Atgron's failure to operate a Whois service available via port 43 in accordance with RFC 3912 and a web-based Directory Service at <whois.nic.TLD> providing free public query-based access to at least the specified elements in the specified format, as required by Section 2.5 of the RA and Section 1 of Specification 4 of the RA.

Please refer to the attachment for details regarding these breaches.

In addition, Atgron has been deemed noncompliant in the following areas:

1. Atgron's failure to provide domain name data in the specified response format, as required by Section 2.5 of the RA and Section 1 of Specification 4 of the RA, the Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement (RAA) regarding applicable Registration Data Directory Service (Whois) Specifications ("Clarifications"), the Additional Whois Information Policy ("AWIP") and the Registry Registration Data Directory Services Consistent Labeling & Display Policy ("CL&D Policy");
2. Atgron's failure to provide a link on the primary website for the top-level domain ("TLD") wed to a webpage designated by ICANN containing Whois policy and educational materials, as required by Section 1.11 of Specification 4 of the RA;
3. Atgron's failure to publish on its website the DNSSEC Practice Statements ("DPS") describing critical security controls and procedures for key material storage, access and usage for its own keys and secure acceptance of registrants' public-key material, as required by Section 1.3 of Specification 6 of the RA; and

4. Atgron's failure to timely pay past due fees, as required by Article 6 of the RA.

ICANN requests that Atgron cure these breaches by 6 January 2018, 30 calendar days from the date of this letter, by taking the following actions:

1. Operate a Whois service available via port 43 in accordance with RFC 3912 and a web-based Directory Service at <whois.nic.TLD> providing free public query-based access to at least the specified elements in the specified format, as required by Section 2.5 of the RA and Section 1 of Specification 4 of the RA;
2. Display domain name data in the specified response format, as required by Section 2.5 of the RA and Section 1 of Specification 4 of the RA, the Clarifications, the AWIP and the CL&D Policy;
3. Provide a link on the primary website for the TLD wed to a webpage designated by ICANN containing Whois policy and educational materials;
4. Publish on Atgron's website the DPS following the format described in RFC 6841;
5. Pay all past and currently due fees; and
6. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that Atgron will comply with its RA requirements, including but not limited to those listed above.

If Atgron discontinues its operations or operation of the TLD, or fails to timely cure the breaches and provide the information requested by 6 January 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,



Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to operate a Whois service

Section 2.5 of the RA requires registry operators to provide public access to registration data in accordance with Specification 4 of the RA. Section 1 of Specification 4 of the RA requires registry operators to operate a Whois service available via port 43 in accordance with RFC 3912 and a web-based Directory Service at <whois.nic.TLD> providing free public query-based access to at least the specified elements in the specified format, outlined in Section 1 of Specification 4 of the RA. Atgron's failure to operate a Whois service available via port 43 in accordance with RFC 3912 and a web-based Directory Service at <whois.nic.TLD> providing free public query-based access is a breach of Section 2.5 of the RA and Section 1 of Specification 4 of the RA. Additionally, under Section 2.13 and Specification 10 of the RA, failure to comply with the required Registration Data Directory Services ("RDDS") obligations may result in the emergency transition of the TLD wed to an emergency interim registry operator of the registry for the TLD.

Failure to display required Whois format

Section 2.5 of the RA requires registry operators to provide public access to registration data in accordance with Specification 4 of the RA. Section 1 of Specification 4 of the RA requires registry operators to display domain name data in a specified format for Whois query responses. The format of Whois query responses shall contain the minimum elements, and follow a semi-free text format, outlined in Section 1 of Specification 4 of the RA. Additional specifications to the format of Whois query responses are contained in the Clarifications, AWIP and CL&D Policy. Section 2.2 of the RA requires registry operators to comply with and implement all Consensus Policies, including the AWIP and CL&D Policy. Atgron's failure to display Whois data in the specified format is a breach of Section 2.5 of the RA and Section 1 of Specification 4 of the RA, Section 2.2 of the RA, the Clarifications, the AWIP and CL&D Policy.

Failure to provide a link to Whois policy and educational materials on website

Section 1.11 of Specification 4 of the RA requires registry operators to provide a link on the primary website for the TLD (i.e., the website provided to ICANN for publishing on the ICANN website) to a webpage designated by ICANN containing Whois policy and educational materials. Atgron's failure to provide a link on the primary website for the TLD wed to a webpage designated by ICANN containing Whois policy and educational materials is a breach of Section 1.11 of Specification 4 of the RA.

Failure to publish DNSSEC Practice Statement on website

Section 1.3 of Specification 6 of the RA requires registry operators to, among other things, publish on its website the DPS describing critical security controls and procedures for key material storage, access and usage for its own keys and secure acceptance of registrants' public-key material following the format described in RFC 6841. Atgron's failure to publish DPS on its website is a breach of Section 1.3 of Specification 6 of the RA.

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. Atgron owes ICANN past due fees, in breach of Article 6 of the RA.

Chronology:

Date of Notice	Deadline for Response	Details
7-Dec-2017	N/A	ICANN sent Escalated compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from Registry Operator.
7-Dec-2017	N/A	ICANN sent Escalated compliance notice via fax to [FAX REDACTED]. Fax successful.
7-Dec-2017	N/A	ICANN called Compliance Contact at [REDACTED] and provided Compliance Contact with complaint details.
7-Dec-2017	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
7-Dec-2017	N/A	To date, the Registry Operator has not responded to ICANN and the issue remains unresolved.