



The Internet Corporation for Assigned Names and Numbers

7 March 2013

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Marco Rinaudo  
Internet.bs Corp. (IANA #814)  
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Nassau  
Bahamas

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

Dear Mr. Rinaudo,

Please be advised that as of 7 March 2014, Internet.bs Corp. (“Internet.bs”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 8 October 2009 (“RAA”). These breaches result from:

1. Failure to take reasonable steps to investigate claimed Whois inaccuracies, as required by Section 3.7.8 of the RAA;
2. Failure to maintain registration records as required by Section 3.4.2 of the RAA; and
3. Failure to make registration records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

Please refer to the attachment for details regarding these breaches.

In addition, Internet.bs has been deemed noncompliant in the following areas:

1. Failure to provide a link to, or display on Internet.bs’ website, the fees required by Section 4.1 of the Expired Registration Recovery Policy (“ERRP”); and

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2. Failure to provide a description on Internet.bs' website of methods used to deliver pre- and post-expiration notifications on registrar's website, as required by Section 4.2 of the ERRP.

ICANN requests that Internet.bs cure the breaches by 28 March 2014, 15 working days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Internet.bs took reasonable steps to investigate and reasonable steps to correct the Whois inaccuracy claims concerning the domain <[monsurvelement.com](http://monsurvelement.com)>. This includes copies of Internet.bs' correspondence with the registrant while investigating the Whois inaccuracy claims (including dates and times and means of inquiries, telephone numbers, e-mail addresses, and postal addresses used) in accordance with Section 3.4 of the RAA;
2. Clearly display a link to renewal fees, post-expiration renewal fees (if different), and redemption/restore fees on Internet.bs' website; and
3. Provide a description of methods used to deliver pre- and post-expiration notifications on Internet.bs' website.

If Internet.bs fails to timely cure the breaches and provide the information requested by 28 March 2014, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at [owen.smigelski@icann.org](mailto:owen.smigelski@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad", is written over a light blue circular watermark.

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



## ATTACHMENT

### Failure to Take Reasonable Steps to Investigate and Correct Whois Inaccuracies

Section 3.7.8 of the RAA requires registrars, upon notification of a claimed inaccuracy in the contact information associated with a registered name sponsored by registrar, to take reasonable steps to investigate the claimed inaccuracy. In the event registrar learns of inaccurate contact information associated with a registered name it sponsors, the registrar shall take reasonable steps to correct that inaccuracy.

ICANN sent Internet.bs a Whois inaccuracy report regarding the domain name <[monsurvetement.com](http://monsurvetement.com)>. As detailed in the chronology, ICANN sent Internet.bs three compliance notices concerning the domain name, and requested that Internet.bs demonstrate that it took reasonable steps to investigate the Whois inaccuracy claims. Internet.bs failed respond to these notices in breach of Section 3.7.8 of the RAA.

### Failure to Retain Registered Name Holder and Registration Data and Failure to Make Such Data Available for Inspection and Copying

Sections 3.4.2 and 3.4.3 of the RAA requires registrars to maintain registered name holder and registration data, and to make those records available to ICANN upon reasonable notice. ICANN requested that Internet.bs make registration records available to ICANN concerning the domain name <[monsurvetement.com](http://monsurvetement.com)>. Internet.bs' failure to provide the requested registration records is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

### Failure to clearly display a link to renewal fees, post-expiration renewal fees (if different), and redemption/restore fees on registrar's website;

Section 4.1 of the ERRP requires registrars to make their renewal fees, post-expiration renewal fees (if different), and redemption/restore fees reasonably available to registered name holders and prospective registered name holders at the time of registration of a gTLD name. At a minimum, these fees must be clearly displayed on the registrar's website and a link to these fees must be included in the registrar's registration agreements. Internet.bs' website does not provide a link or clearly display these fees in breach of Section 4.1 of the ERRP.

Failure to describe on their websites (if used) the methods used to deliver pre- and post-expiration notifications.

Section 4.2 of the ERRPP requires registrars to describe on their websites (if used) the methods used to deliver pre- and post-expiration notifications for renewal of domain registrations. The website of Internet.bs does not describe these notifications in breach of Section 4.2 of the ERRP.

**Chronology:**

Date of Notice	Deadline for Response	Details
22-Jan-14	12-Feb-14	ICANN sent 1st compliance notice via email to <a href="mailto:whois.data.problem.reports@internet.bs">whois.data.problem.reports@internet.bs</a> . No response received from Registrar.
13-Feb-14	20-Feb-14	ICANN sent 2nd compliance notice via email to <a href="mailto:whois.data.problem.reports@internet.bs">whois.data.problem.reports@internet.bs</a> . No response received from Registrar.
19-Feb-14	N/A	ICANN called Registrar at +1 646 383 1418 and received an automated message indicating the call could not be completed. ICANN called Registrar's Primary Contact's mobile (REDACTED) and left voice message.
24-Feb-14	3-Mar-14	ICANN sent 3rd compliance notice via email to <a href="mailto:whois.data.problem.reports@internet.bs">whois.data.problem.reports@internet.bs</a> and <a href="mailto:marco.rinaudo@internet.bs">marco.rinaudo@internet.bs</a> . No response received from Registrar.
24-Feb-14	N/A	The 3rd compliance notice was successfully faxed to +44 2071132165.
26-Feb-14	N/A	ICANN called Registrar at +1 646 383 1418. The telephone call disconnected while leaving a message. ICANN called +1 646 383 1418 again and received an automated message stating the call could not be completed. ICANN called Registrar's Primary Contact's mobile (REDACTED) and left a voice message.



<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
6-Mar-14	N/A	ICANN conducted check to determine other areas of noncompliance.
7-Mar-14	N/A	To date, no response received from Registrar.