



The Internet Corporation for Assigned Names and Numbers

17 September 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

James Archer  
Registration Technologies, Inc. (IANA # 321)  
1102 Pontiac Av, STE C  
Cranston, RI 02920  
United States

Email: [jarcher@registrationtek.com](mailto:jarcher@registrationtek.com)  
Fax Number: +1 401 679 0404

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

Dear Mr. Archer,

Please be advised that as of 17 September 2014, Registration Technologies, Inc. (“Registration Technologies”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 4 October 2010 (“RAA”). These breaches result from:

1. Registration Technologies’ failure to maintain and make available to ICANN registration records relating to dealings with the Registered Name Holder (“RNH”) of the domain name <alvideo.com>, pursuant to Sections 3.4.2 and 3.4.3 of the RAA;
2. Registration Technologies’ failure to allow the RNH of the domain name <alvideo.com> to transfer its domain registration to another registrar pursuant to Section 1 of the Inter-Registrar Transfer Policy (“IRTP”), or, alternatively, provide a valid reason for denial pursuant to Section 3 of the IRTP; and
3. Registration Technologies’ failure to provide the AuthInfo code within five calendar days to the RNH of the domain name <alvideo.com>, pursuant to Section 5 of the IRTP.

Please refer to the attachment for details regarding these breaches.

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

Los Angeles Offices: 12025 Waterfront Drive, Suite 300 • Brussels • Los Angeles, CA 90094 • Istanbul • USA • Montevideo • T +1 310 301 5800 • Singapore • F +1 310 823-8649 • Washington

<http://icann.org>



1. Failure to display a link to ICANN's Registrant Educational Information webpage, as required by Section 3.15 RAA; and
2. Failure to provide a policy consistent with the requirements of Section 2.1 of the Expired Registration Recovery Policy ("ERRP") to send expiration reminder notices approximately one week prior to expiration and within 5 days after expiration.

#### Additional Considerations

ICANN notes that Registration Technologies exhibits a pattern of non-responsiveness to transfer requests by RNHs and ICANN compliance notices. In addition, ICANN staff is often unable to contact Registrar Technologies via telephone during business hours in the United States.

ICANN requests that Registration Technologies cure the breaches by 8 October 2014, 15 business days from the date of this letter, by taking the following actions:

1. Provide copies of all written communications, including time-stamped communications, between Registration Technologies and the RNH of the domain name <alvideo.com>, including a copy of the registration agreement entered between Registration Technologies and the RNH, all renewal reminders, and all expiration notices sent to the RNH;
2. Provide the AuthInfo code to the RNH of the domain <alvideo.com>, and unlock the domains for transfer;
3. Clearly display a link to ICANN's Registrant Educational Information webpage on Registration Technologies' website;
4. Provide ICANN with a remediation plan, including dates and milestones, to ensure Registration Technologies will send out expiration reminder notices to the RNHs of domain names that it sponsors at the intervals required by the ERRP; and
5. Provide ICANN with corrective and preventative action(s), including implementation dates and milestones, to ensure that Registration Technologies will timely respond to ICANN and RNH inquiries.

If Registration Technologies fails to timely cure the breaches and provide the information requested by 8 October 2014, ICANN may commence the RAA termination process.



James Archer  
Registration Technologies, Inc.

Page 3 of 5

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". The signature is fluid and cursive, with the first letter "M" being particularly large and stylized.

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



## ATTACHMENT

### 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. As detailed in the chronology below, ICANN sent Registration Technologies multiple notices requesting registration data and records. To date, Registration Technologies has not provided these documents. Registration Technologies' failure to maintain and provide the requested data and records is a breach of sections 3.4.2 and 3.4.3 of the RAA.

### Failure to provide AuthInfo Code within five calendar days of RNH request

Paragraph 5 of the IRTP requires registrars to provide the RNH with the unique AuthInfo code within five (5) calendar days of the RNH's initial request. Registration Technologies' failure to provide the AuthInfo code within five days of the RNH's request concerning domain name <alvideo.com> is a breach of Section 5 of the IRTP.

### Failure to allow RNH to transfer its domain name registration to another registrar or, alternatively, provide a valid reason for denying the transfer

Section 1 of the IRTP states that RNHs must be able to transfer their domain name registrations between registrars. Registrars may only deny a transfer request for the specific instances listed in Section 3 IRTP. Registration Technologies' failure to allow the transfer of the domain name <alvideo.com> or provide a valid reason for denial of transfer is a breach of the IRTP.

### Failure to display a link to ICANN's Registrant Education Information Webpage

Section 3.15 of the RAA requires registrars to clearly display a link to ICANN's Registrant Educational Information webpage on its website. Registration Technologies' failure to provide a link to ICANN's Registrant Educational Information webpage on its website is a breach of Section 3.15 of the RAA.

### Failure to send expiration reminder notices at required intervals

Section 2.1 of the ERRP requires registrars to notify the RNH of the expiration of a domain name at specific intervals. Pre-expiration reminder notices must be sent approximately one month prior to expiration and approximately one week prior to expiration. If a registration is not renewed by the RNH or deleted by the registrar, registrars must also send a post-expiration reminder notice within



five days after the expiration of the registration. Registration Technologies' website posts a policy that does not comply with Section 2.1 of the ERRP and the failure to send expiration reminder notifications at the required intervals is a breach of Section 2.1 of the ERRP.

**Chronology:**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
19-Aug-2014	26-Aug-2014	ICANN sent 1st compliance notice via email to <a href="mailto:jarcher@registrationtek.com">jarcher@registrationtek.com</a> . No response received from Registrar.
27-Aug-2014	5-Sep-2014	ICANN sent 2nd compliance notice via email to <a href="mailto:jarcher@registrationtek.com">jarcher@registrationtek.com</a> and <a href="mailto:support@registrationtek.com">support@registrationtek.com</a> . No response received from Registrar.
3-Sep-2014	N/A	ICANN spoke with Primary Contact on mobile number at [REDACTED] and provided complaint details. ICANN reminded Registrar that it must still respond to notices even if transfer was completed. Registrar acknowledged this obligation and ensured that the complaint would be addressed by the due date. No response received from Registrar.
8-Sep-2014	15-Sep-2014	ICANN sent 3rd compliance notice via email to <a href="mailto:jarcher@registrationtek.com">jarcher@registrationtek.com</a> and <a href="mailto:support@registrationtek.com">support@registrationtek.com</a> . No response received from Registrar.
8-Sep-2014	N/A	ICANN sent 3rd compliance notice via fax to +1 401 679 0404. Fax successful.
11-Sep-2014	N/A	ICANN left detailed message for Primary Contact at +1 401 648 2123 with complaint details and ICANN staff direct dial for any questions.
16-Sept-2014	N/A	ICANN conducted compliance check to determine other areas of noncompliance
17-Sept-2014	N/A	No response received from Registrar, and transfer has not been completed.