



The Internet Corporation for Assigned Names and Numbers

2 June 2015

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Bruce Gerlach
Catalog.com (IANA #112)
14000 Quail Springs Pkwy, Suite 230
Oklahoma City, OK 73134
United States

Email: bgerlach@catalog.com
Fax: +1 405 753 9353

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Mr. Gerlach,

Please be advised that as of 2 June 2015, Catalog.com (“Catalog”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 16 September 2014 (“RAA”). These breaches result from:

1. Catalog’s failure to maintain and make available to ICANN registration data and records relating to dealings with the Registered Name Holder (“RNH”) of the domain name <esperanto-nc.org>, as required by Sections 3.4.2 and 3.4.3 of the RAA; and
2. Catalog’s failure to validate and verify Whois contact information, as required by Sections 1, 2, and 4 of the Whois Accuracy Program Specification (“WAPS”) of the 2013 RAA.

Please refer to the attachment for details regarding these breaches.

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

1. Failure to clearly display a link to ICANN’s Registrant Educational Information webpage, as required by Section 3.16 of the RAA;

Los Angeles
Offices:

12025 Waterfront Drive, Suite 300
Beijing • Brussels •

Los Angeles, CA 90094 USA
Istanbul • Montevideo •

T +1 310 301 5800
• Singapore •

F +1 310 823-8649
• Washington

<http://icann.org>



2. Failure to publish the full name and position of all officers of the registrar on Catalog's website, as required by Section 3.17 and Section 17 of the Registrar Information Specification ("RIS") of the RAA;
3. Failure to publish a correspondence address on Catalog's website, as required by Section 3.17 and Section 7 of the RIS of the RAA;
4. Failure to publish an email address to receive abuse reports on the home page of Catalog's website, as required by Section 3.18.1 of the RAA;
5. Failure to publish on its website a description of Catalog's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;
6. Failure to provide an interactive webpage Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by Catalog for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA;
7. Failure to publish on Catalog's website 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;
8. Failure to clearly display on Catalog's website, and include a link in its registration agreement, to its renewal fees and post-expiration renewal fees (if different), as required by Section 4.1 of Expired Registration Recovery Policy ("ERRP"); and
9. Failure to display the correct ICANN logo on Catalog's website, as required by the Logo License Specification of the RAA.

ICANN requests that Catalog cure these breaches by 23 June 2015, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide records and information demonstrating that Catalog took steps to verify and validate the Whois information of the domain name <esperanto-nc.org>;
2. Clearly display a link to ICANN's Registrant Educational Information webpage on Catalog's website;
3. Publish on Catalog's website the full name and position of all officers of Catalog;



4. Publish on Catalog's website the correspondence address of Catalog;
5. Publish an email address to receive abuse reports on the home page of Catalog's website;
6. Publish a description of Catalog's procedures for the receipt, handling and tracking of abuse reports on Catalog's website;
7. Provide an interactive webpage Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by Catalog for each TLD in which it is accredited;
8. Publish on Catalog's website(s) and/or provide a link on its website to the Registrants' Benefits and Responsibilities Specification;
9. Clearly display a link to renewal fees and post-expiration renewal fees (if different) on Catalog's website and provide a link to the renewal fees and post-expiration renewal fees (if different) in Catalog's registration agreement; and
10. Display the correct ICANN logo on Catalog's website in accordance with the Logo License Specification of the RAA, or remove the ICANN logo from Catalog's website.

If Catalog fails to timely cure the breaches and provide the information requested by 23 June 2015, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at 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 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 RNH and registration data, and to make those records available to ICANN upon reasonable notice. Catalog's failure to provide the requested registration records and data related to the domain name <esperanto-nc.org> is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to validate and verify changed Whois data

Section 1 of the WAPS of the 2013 RAA requires registrars to validate that required fields, including telephone numbers, postal addresses and email addresses, are in a standard format or template, as well as verify the email address of the registrant by receiving an affirmative response from the registrant.

Section 2 of the WAPS of the 2013 RAA requires registrars to perform validation and verification, as set forth in Section 1 of the WAPS, if a registrar receives changes to any Whois contact information, whether the contact information was previously verified or validated. The registrar is required to (1) receive an affirmative response from the registrant, (2) manually verify the information or (3) suspend the domain name.

Section 4 of the WAPS of the 2013 RAA requires registrars to perform validation and verification, as set forth in Section 1 of the WAPS, if a registrar has any information suggesting that the contact information specified in the Whois is incorrect. The registrar must also (1) verify (or re-verify) the registrant's email address by receiving an affirmative response, (2) manually verify the information or (3) suspend the domain name.

Catalog's failure to provide documents and information demonstrating validation and verification of the Whois data for the domain name <esperanto-nc.org> is a breach of the WAPS of the RAA.

Failure to display a link to ICANN's Registrant Educational Information Webpage

Section 3.16 of the RAA requires registrars to clearly display a link on its website to ICANN's Registrant Educational Information webpage. Catalog's failure to provide a link to ICANN's Registrant Educational Information webpage on its website is a breach of Section 3.16 of the RAA.



Failure to publish the correspondence address and the full name and position of all officers and 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. Catalog's failure to publish its correspondence address and the full name and position of all of its officers on its website is a breach of Section 3.17 of the RAA and Sections 7 and 17 of the RIS.

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 websites an email address to receive abuse reports. Catalog'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 websites a description of their procedures for the receipt, handling and tracking of abuse reports. Catalog'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 provide an interactive webpage Whois service

Section 3.3.1 of the RAA requires registrars to provide an interactive webpage and a port 43 Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by the registrar. Catalog's failure to provide an interactive webpage Whois service that when queried results in full, up-to-date Whois data for its active registered names is a breach of Section 3.3.1 of the RAA.

Failure to publish on registrar'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 of attached to the RAA. Catalog'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 clearly display a link to renewal fees and post-expiration renewal fees (if different) 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 RNHs and prospective RNHs 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. Catalog's failure to provide a link or clearly display renewal fees and post-expiration renewal fees (if different) is a breach of Section 4.1 of the ERRP.

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. Catalog's use of a modified version of the ICANN-Accredited Registrar logo is a breach of the Logo License Specification of the RAA.

Chronology:

Date of Notice	Deadline for Response	Details
9-Mar-2015	30-Mar-2015	ICANN sent 1st compliance notice via email to bgerlach@catalog.com .
11-Mar-2015	N/A	Email from Registrar (BGerlach@webhero.com) insufficient to demonstrate compliance.
12-Mar-2015	30-Mar-2015	ICANN sent follow up compliance notice via email to bgerlach@catalog.com . No response received from Registrar.
10-Apr-2015	17-Apr-2015	ICANN sent 2nd compliance notice via email to bgerlach@catalog.com .
14-Apr-2015	N/A	ICANN spoke with Primary Contact at 1-405-753-9300 x 157 and provided complaint details.
14-Apr-2015	N/A	Email from Registrar (BGerlach@webhero.com) insufficient to demonstrate compliance.
15-Apr-2015	17-Apr-2015	ICANN sent follow up compliance notice via email to bgerlach@catalog.com .
15-Apr-2015	N/A	Email from Registrar (BGerlach@webhero.com) insufficient to demonstrate compliance.



Date of Notice	Deadline for Response	Details
17-Apr-2015	17-Apr-2015	ICANN sent follow up compliance notice via email to bgerlach@catalog.com .
20-Apr-2015	N/A	Email from Registrar (BGerlach@webhero.com) insufficient to demonstrate compliance.
20-Apr-2015	N/A	ICANN spoke with Primary Contact at 1-405-753-9300 x 157 and provided complaint details.
21-Apr-2015	28-Apr-2015	ICANN sent 3rd compliance notice via email to bgerlach@catalog.com . No response received from Registrar.
21-Apr-2015	N/A	ICANN sent 3rd compliance notice via fax to 1-405-753-9353. Fax successful.
28-Apr-2015	N/A	ICANN called Primary Contact at 1-405-753-9300 x 157. No answer. Left message with complaint details.
30-Apr-2015	N/A	ICANN called Primary Contact at 1-405-753-9300 x 157. No answer. Left message with complaint details.
1-May-2015	8-May-2015	ICANN sent follow up compliance notice via email to bgerlach@catalog.com . No response received from Registrar.
29-May-2015	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
2-Jun-2015	N/A	To date, Registrar has not responded to ICANN with the requested information and the issue remains unresolved.