



5 July 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Murat Yaniklar
Ground Internet, Inc. (IANA #936)
Uludag Universitesi Ulutek Teknoloji Merkezi TURKTICARET.Net Ofisi,
Nilufer Bursa 16059
Turkey

Email: info@groundinternet.com

Fax: +90 224 2249520

Dear Mr. Yaniklar,

Please be advised that as of 5 July 2017, Ground Internet, Inc. ("Ground Internet") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 25 September 2014 ("RAA"). This breach results from:

1. Ground Internet's failure 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 Ground Internet for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA.

Please refer to the attachment for details regarding this breach.

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

1. Ground Internet's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA; and
2. Ground Internet's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Additional Concerns

ICANN notes that the website for Ground Internet does not currently resolve, and was unable to review the website to complete the compliance check.

ICANN requests that Ground Internet cure these breaches by 26 July 2017, 21 days from the date of this letter, by taking the following actions:

1. 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 Ground Internet for each TLD in which it is accredited;
2. Deposit gTLD registration data on a weekly basis to an approved escrow agent and ensure that the deposits meet the required specifications; and
3. Pay all past and currently due accreditation fees.

If Ground Internet fails to timely cure the breaches and provide the information requested by 26 July 2017, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at owen.smigelski@icann.org.

Sincerely,



Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to provide an interactive webpage and port 43 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. Ground Internet’s failure to provide an interactive webpage and a port 43 Whois service is a breach of Section 3.3.1 of the RAA.

Failure to escrow gTLD registration data

Section 3.6 of the RAA requires registrars to submit an electronic copy of the data described in Sections 3.4.1.2 through 3.4.1.5 of the RAA to ICANN, or at the registrar’s expense, to a reputable escrow agent mutually approved by the registrar and ICANN. Registrars shall submit the data on a schedule, under the terms, and in a format specified by ICANN. Ground Internet’s failure to deposit all gTLD registration data with an approved escrow agent under the required schedule, terms, and in the format specified by ICANN is a breach of Section 3.6 of the RAA.

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. Ground Internet owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA. Ground Internet additionally owes currently due accreditation fees, due 15 July 2017.

Chronology:

Date of Notice	Deadline for Response	Details
21-May-2017	29-May-2017	ICANN sent 1st compliance notice via email to info@groundinternet.com. No response received from Registrar.
30-May-2017	6-Jun-2017	ICANN sent 2nd compliance notice via email to info@groundinternet.com. No response received from Registrar.
6-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and provided Registrar Representative with complaint details.
12-Jun-2017	19-Jun-2017	ICANN sent 3rd compliance notice via email to info@groundinternet.com.
12-Jun-2017	N/A	ICANN sent 3rd compliance notice via fax to +902242249520. Fax successful.
14-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and provided Registrar Representative with complaint details.
19-Jun-2017	N/A	Email from Registrar info@groundinternet.com insufficient to demonstrate compliance.

20-Jun-2017	27-Jun-2017	ICANN sent follow-up compliance notice via email to info@groundinternet.com. No response received from Registrar.
20-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and at mobile number [NUMBER REDACTED]. No answer and no ability to leave a voicemail.
23-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and mobile number [NUMBER REDACTED] and provided Registrar Representative with complaint details.
28-Jun-2017	N/A	Registrar Representative called ICANN via +90 224 2248640. ICANN provided Registrar Representative with complaint details.
3-Jul-2017	N/A	ICANN conducted compliance check to determine other areas of noncompliance.