



The Internet Corporation for Assigned Names and Numbers

6 June 2016

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Arindom Hazarika
Bharti Airtel Limited (airtel)
Bharti Crescent
1 Nelson Mandela Road, Vasant Kunj, Phase II
New Delhi, Delhi 110070
IN

Email: arindom.hazarika@bharti.in

Fax: +911141666139

RE: NOTICE OF BREACH OF REGISTRY AGREEMENT

Dear Arindom Hazarika,

Please be advised that as of 6 June 2016, Bharti Airtel Limited (“Bharti Airtel”) is in breach of its Registry Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 24 October 2014 (“RA”). These breaches result from:

1. Bharti Airtel’s failure to provide a link on the primary website for the TLD airtel to a webpage designated by ICANN containing Whois policy and educational materials, as required by Section 1.11 of Specification 4 of the RA;
2. Bharti Airtel’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;
3. Bharti Airtel’s failure to publish on its website abuse contact details, including a valid email and mailing address and primary contact for handling inquiries related to malicious conduct in the TLD airtel, as required by Section 4.1 of Specification 6 of the RA; and

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>



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

Please refer to the attachment for details regarding these breaches.

Additional Concerns

ICANN notes that Bharti Airtel exhibits a pattern of non-response to ICANN Contractual Compliance matters and, when responses are provided to ICANN, they are often untimely and incomplete.

ICANN requests that Bharti Airtel cure these breaches by 6 July 2016, 30 calendar days from the date of this letter, by taking the following actions:

1. Provide a link on the primary website for the TLD airtel to a webpage designated by ICANN containing Whois policy and educational materials;
2. Publish on Bharti Airtel's website the DNSSEC Practice Statements following the format described in RFC 6841;
3. Publish on Bharti Airtel's website its accurate contact details including a valid email and mailing address as well as a primary contact for handling inquiries related to malicious conduct in the TLD airtel;
4. Provide ICANN with the corrective and preventative action(s) that Bharti Airtel will take, with implementation date(s), to address its pattern of untimely, incomplete and non-response to ICANN Contractual Compliance matters; and
5. Pay all past due fees.

If Bharti Airtel fails to timely cure the breaches and provide the information requested by 6 July 2016, ICANN may commence the RA termination process.



If you have questions or require assistance, please contact Jennifer Scott at jennifer.scott@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 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. Bharti Airtel's failure to provide a link on the primary website for the TLD airtel 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 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 following the format described in RFC 6841. Bharti Airtel's failure to publish DPS on its website is a breach of Section 1.3 of Specification 6 of the RA.

Failure to publish abuse contact information on website

Section 4.1 of Specification 6 of the RA requires registry operators to provide to ICANN and publish on its website its accurate contact details including a valid email and mailing address as well as a primary contact for handling inquiries related to malicious conduct in the TLD, and provide ICANN with prompt notice of any changes to such contact details. Bharti Airtel's failure to publish abuse contact details on its website for TLD airtel is a breach of Section 4.1 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. Bharti Airtel owes ICANN past due fees in breach of Article 6 of the RA.

Chronology:

| Date of Notice | Deadline for Response | Details |
|--|------------------------------|---|
| 8-Feb-2016 7-Mar-2016 1-Apr-2016 | N/A | ICANN Accounting sent detailed customer accounting statement to Registry Operator regarding past due fees. |
| 19-Feb-2016 | 26-Feb-2016 | ICANN sent 1st compliance inquiry via email to domains.admin@bharti.in . |
| 25-Feb-2016 | N/A | Email from Registry Operator (domains.admin@bharti.in) requesting a one week extension to respond and insufficient to demonstrate compliance. |
| 26-Feb-2016 | 4-Mar-2016 | ICANN resent 1st compliance inquiry via email to domains.admin@bharti.in with extended due date. |
| 3-Mar-2016 | N/A | Email from Registry Operator (domains.admin@bharti.in) requesting an additional extension to respond and insufficient to demonstrate compliance. |
| 3-Mar-2016 | 10-Mar-2016 | ICANN resent 1st compliance inquiry via email to domains.admin@bharti.in with extended due date. |
| 10-Mar-2016 | N/A | Email from Registry Operator (domains.admin@bharti.in) requesting an additional extension to respond and insufficient to demonstrate compliance. |
| 14-Mar-2016 | 21-Mar-2016 | ICANN sent 2nd compliance inquiry via email to domains.admin@bharti.in and manpreetk@airtel.com . No response received from Registry Operator. |
| 18-Mar-2016 | N/A | ICANN called Compliance Contact at +911244222222. No answer and no ability to leave a message. ICANN called Compliance Contact at mobile number [NUMBER REDACTED] and provided inquiry details. |
| 22-Mar-2016 | 29-Mar-2016 | ICANN sent 3rd compliance inquiry via email to domains.admin@bharti.in , manpreetk@airtel.com and akshay.kanade@airtel.com . |
| 22-Mar-2016 | N/A | ICANN sent 3rd compliance inquiry via fax to +911141666139. Fax successful. |
| 23-Mar-2016 | N/A | Email from Registry Operator (manpreetk@airtel.com) insufficient to demonstrate compliance. |

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 23-Mar-2016 | N/A | Email from Registry Operator (ravinder.bhardwaj@airtel.com) insufficient to demonstrate compliance. |
| 23-Mar-2016 | N/A | Email from Registry Operator (arindom.hazarika@bharti.in) insufficient to demonstrate compliance. |
| 23-Mar-2016 | 29-Mar-2016 | ICANN sent follow-up compliance inquiry via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 28-Mar-2016 | N/A | Email from Registry Operator (domains.admin@bharti.in) requesting an additional extension to respond and insufficient to demonstrate compliance. |
| 28-Mar-2016 | 29-Mar-2016 | ICANN sent follow-up compliance inquiry via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 28-Mar-2016 | N/A | Email from Registry Operator (arindom.hazarika@bharti.in) requesting an additional extension to respond and insufficient to demonstrate compliance. |
| 28-Mar-2016 | 29-Mar-2016 | ICANN sent follow-up compliance inquiry via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 29-Mar-2016 | N/A | ICANN called and spoke with Registry Operator representative at mobile number [NUMBER REDACTED] and provided inquiry details. |
| 29-Mar-2016 | N/A | Email from Registry Operator (arindom.hazarika@bharti.in) requesting an additional extension to respond and insufficient to demonstrate compliance. |
| 30-Mar-2016 | 6-Apr-2016 | ICANN sent escalated compliance notice via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 30-Mar-2016 | N/A | ICANN sent escalated compliance notice via fax to +911141666139. Fax successful. |

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|--|
| 31-Mar-2016 | N/A | ICANN called and spoke with Registry Operator representative at mobile number [NUMBER REDACTED] and provided notice details. |
| 1-Apr-2016 | N/A | Email from Registry Operator (domains.admin@bharti.in) requesting an additional extension to respond and insufficient to demonstrate compliance. |
| 1-Apr-2016 | 6-Apr-2016 | ICANN sent follow up compliance notice via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 4-Apr-2016 | 6-Apr-2016 | ICANN sent follow up compliance notice via email and requested a conference call on 5 April 2016 to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 5-Apr-2016 | N/A | ICANN called and spoke with Compliance Contact at mobile number [NUMBER REDACTED] who requested ICANN speak with other Registry Operator representatives. |
| 5-Apr-2016 | N/A | ICANN called Primary and Legal Contacts at the following numbers with no answer and no ability to leave a message: +911244222222 and mobile number [NUMBER REDACTED]. ICANN called Legal Contact at mobile number [NUMBER REDACTED] and was told it was a wrong number. ICANN called Registry Operator representative at mobile number [NUMBER REDACTED]. No answer and no ability to leave a message. |
| 5-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 5-Apr-2016 | N/A | Email from Registry Operator (arindom.hazarika@bharti.in) insufficient to demonstrate compliance. |
| 7-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 8-Apr-2016 | 11-Apr-2016 | ICANN sent follow up compliance notice via email and requested a conference call on 11 April 2016 to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 8-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 9-Apr-2016 | 11-Apr-2016 | ICANN sent follow up compliance notice via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 11-Apr-2016 | N/A | ICANN conducted conference call with Primary Contact at mobile number [NUMBER REDACTED]. |
| 11-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 12-Apr-2016 | 19-Apr-2016 | ICANN sent follow up compliance notice via email to domains.admin@bharti.in , manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 19-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 19-Apr-2016 | 20-Apr-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 20-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 20-Apr-2016 | N/A | ICANN requested updated accounting information be provided to Registry Operator regarding past due fees. |
| 22-Apr-2016 | 23-Apr-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com , ravinder.bhardwaj@airtel.com and arindom.hazarika@bharti.in . |
| 25-Apr-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |

| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 25-Apr-2016 | N/A | Email from Registry Operator's Registry Service Provider (jhooper@verisign.com) requesting clarification. |
| 27-Apr-2016 | N/A | ICANN responded to Registry Operator's Registry Service Provider via email to jhooper@verisign.com , manpreetk@airtel.com and domains.admin@bharti.in . |
| 27-Apr-2016 | N/A | Email from Registry Operator's Registry Service Provider (jhooper@verisign.com) with follow up question. |
| 27-Apr-2016 | 31-May-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com and arindom.hazarika@bharti.in with a one month remediation period. No response received from Registry Operator. |
| 2-May-2016 | 3-May-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com and arindom.hazarika@bharti.in . |
| 3-May-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 4-May-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 6-May-2016 | 9-May-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com , arindom.hazarika@bharti.in and rahul.patranabish@airtel.com . |
| 9-May-2016 | N/A | ICANN responded to Registry Operator's Registry Service Provider via email to jhooper@verisign.com . |
| 10-May-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 16-May-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 19-May-2016 | 31-May-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com and arindom.hazarika@bharti.in . |
| 31-May-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 31-May-2016 | 31-May-2016 | ICANN sent follow up compliance notice via email to manpreetk@airtel.com , akshay.kanade@airtel.com and arindom.hazarika@bharti.in . |



| Date of Notice | Deadline for Response | Details |
|----------------|-----------------------|---|
| 1-Jun-2016 | N/A | Email from Registry Operator (manpreetk@airtel.com) insufficient to demonstrate compliance. |
| 6-Jun-2016 | N/A | Email from Registry Operator (akshay.kanade@airtel.com) insufficient to demonstrate compliance. |
| 6-Jun-2016 | N/A | ICANN conducted compliance check to determine other areas of noncompliance. |
| 6-Jun-2016 | N/A | To date, Registry Operator has not provided ICANN the requested information and the issues remain unresolved. |