



The Internet Corporation for Assigned Names and Numbers

30 March 2016

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

James Fromm
Omnis Network, LLC (IANA # 143)
3655 Torrance Blvd., Ste. 230
Torrance, CA 90503
United States

Email: fromm@omnis.com
Fax: +1.3103164991

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Mr. Fromm,

Please be advised that as of 30 March 2016, Omnis Network, LLC (“Omnis Network”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 13 April 2015 (“RAA”). These breaches result from:

1. Omnis Network’s failure to complete and deliver to ICANN a compliance certificate within twenty (20) days following the end of the 2015 calendar year certifying compliance with the terms and conditions of the RAA, as required by Section 3.15 of the RAA; and
2. Omnis Network’s failure to take reasonable steps to investigate and correct claimed Whois inaccuracies regarding the domain name <leftfield-entertainment.com>, as required by Section 3.7.8 of the RAA.
3. Omnis Network’s failure to validate and verify Whois contact information, as required by Section 4 of the Whois Accuracy Program Specification (“WAPS”) of the RAA.

Please refer to the attachment for details regarding these breaches.



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

1. Failure to publish on its website a description of Omnis Network's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA; and
2. Failure to publish the full name and position of all officers of the registrar on Omnis Network's website, as required by Section 3.17 of the RAA and Section 17 of the Registrar Information Specification ("RIS") of the RAA.

Additional Considerations

ICANN notes that Omnis Network exhibits a pattern of non-responsiveness to ICANN compliance notices. In addition, ICANN staff is often unable to contact Omnis Network via telephone during business hours in the United States.

ICANN requests that Omnis Network cures these breaches by 20 April 2016, 21 days from the date of this letter, by taking the following actions:

1. Provide a certificate executed by the president, chief executive officer, chief financial officer or chief operating officer (or their equivalents) of Omnis Network certifying compliance with the terms and conditions of the RAA;
2. Provide records demonstrating that Omnis Network took reasonable steps to investigate and, where applicable, correct the Whois inaccuracy concerning the domain name <leftfield-entertainment.com>. This includes: (a) copies of Omnis Network's correspondence with the Registered Name Holder while investigating the Whois inaccuracy claims (including dates, times, means of inquiries, telephone numbers, e-mail addresses and postal addresses used) and (b) the steps Omnis Network took to verify and validate the Whois information;
3. Publish a description of Omnis Network's procedures for the receipt, handling and tracking of abuse reports on Omnis Network's website;
4. Publish on Omnis Network's website the full name and position of all officers of Omnis Network; and



5. Provide ICANN with corrective and preventative action(s), including implementation dates and milestones, to ensure that Omnis Network will timely respond to ICANN compliance notices.

If Omnis Network fails to timely cure the breaches and provide the information requested by 20 April 2016, 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 horizontal line.

Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



ATTACHMENT

Failure to submit to ICANN annual compliance certificate

Section 3.15 of the RAA requires registrars to complete and deliver to ICANN within twenty (20) days following the end of each calendar year, in a form specified by ICANN, a certificate executed by the president, chief executive officer, chief financial officer or chief operating officer (or their equivalents) of the registrar certifying compliance with the terms and conditions of the RAA. Omnis Network's failure to complete and deliver the compliance certificate for 2015 is a breach of Section 3.15 of the RAA.

Failure to take reasonable steps to investigate and correct Whois inaccuracy

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 a registrar, to take reasonable steps to investigate the claimed inaccuracy. In the event the registrar learns of inaccurate contact information associated with a registered name it sponsors, the registrar shall take reasonable steps to correct that inaccuracy. Omnis Network's failure to provide documentation demonstrating the reasonable steps it took to investigate and correct the alleged Whois inaccuracy is a breach of Section 3.7.8 of the RAA.

Failure to validate and verify Whois data

Section 4 of the WAPS of the 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.

Omnis Network's failure to provide documents and information demonstrating validation and verification of the Whois data for the domain name <leftfield-entertainment.com> is a breach of the WAPS 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 website a description of their procedures for the receipt, handling and tracking of abuse reports. Omnis Network'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 publish the full name and position of all officers 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.

Omnis Network's failure to publish the full name and position of all of its officers on its website is a breach of Section 3.17 of the RAA and Section 17 of the RIS.

Chronology:

IKC-351-81854 (compliance certificate)

Date of Notice	Deadline for Response	Details
12-Feb-2016	19-Feb-2016	ICANN sent 1st inquiry via email to fromm@omnis.com . No response received from Registrar.
22-Feb-2016	29-Feb-2016	ICANN sent 1st compliance notice via email to fromm@omnis.com . No response received from Registrar.
1-Mar-2016	8-Mar-2016	ICANN sent 2nd compliance notice via email to fromm@omnis.com . No response received from Registrar.
3-Mar-2016	N/A	ICANN called Primary Contact at +1.3103161425. ICANN left voice message with complaint details.
11-Mar-2016	18-Mar-2016	ICANN sent 3rd compliance notice via email to fromm@omnis.com . No response received from Registrar.
11-Mar-2016	N/A	ICANN sent 3rd compliance notice via fax to +1.3103164991. Fax successfully sent.



Date of Notice	Deadline for Response	Details
17-Mar-2016	N/A	ICANN called Primary Contact at +1.3103161425. ICANN left voice message with complaint details.
24-Mar-2016	N/A	ICANN conducted compliance check to determine other areas of non-compliance.
30-Mar-2016	N/A	To date, Registrar has not responded to ICANN with the requested information and documentation and issues remain unresolved

ZZC-143-78825 (Whois inaccuracy)

Date of Notice	Deadline for Response	Details
19-Feb-2016	11-Mar-2016	ICANN sent 1st compliance notice via email to fromm@omnis.com . No Response received from Registrar.
14-Mar-2016	21-Mar-2016	ICANN sent 2nd compliance notice via email to fromm@omnis.com . No Response received from Registrar.
17-Mar-2016	N/A	ICANN called Primary Contact at +1.3103161425. ICANN left voice message with complaint details.
22-Mar-2016	29-Mar-2016	ICANN sent 3rd compliance notice via email to fromm@omnis.com . No Response received from Registrar.
22-Mar-2016	N/A	ICANN sent 3rd compliance notice via fax to +1.3103164991. Fax successful.



Date of Notice	Deadline for Response	Details
25-Mar-2016	N/A	ICANN called Primary Contact at +1.3103161425. ICANN left voice message with complaint details.
30-Mar-2016	N/A	ICANN conducted compliance check to determine other areas of non-compliance.
30-Mar-2016	N/A	To date, Registrar has not responded to ICANN with the requested information and documentation and issues remain unresolved