



The Internet Corporation for Assigned Names and Numbers

30 March 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Rick Wesson  
Alice's Registry, Inc. (IANA #275)  
One Market Plaza Spear Tower 3600  
San Francisco CA 94105  
United States

Email: [support@alices-registry.com](mailto:support@alices-registry.com)  
Fax: +1 415 651 9645

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

Dear Rick Wesson,

Please be advised that as of 30 March 2017, Alice's Registry, Inc. ("Alice's Registry") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 17 October 2015 ("RAA"). This breach results from:

1. Alice's Registry's failure to allow the Registered Name Holder ("RNH") of the domain name <analgesia.net> to transfer its domain registration to another registrar pursuant to Section 1 of the Transfer Policy ("TP"), or, alternatively, provide a valid reason for denial pursuant to Section 3 of the TP;
2. Alice's Registry's failure to provide the AuthInfo code to the RNH of the domain name <analgesia.net> within five calendar days of the RNH's request, as required by Section I.A.5 of the TP; and
3. Alice's Registry's failure to maintain and make available to ICANN registration data and records relating to dealings with the RNH of the domain name <analgesia.net>, as required by Sections 3.4.2 and 3.4.3 of the RAA.

Please refer to the attachment for details regarding these breaches.

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<http://icann.org>



In addition, Alice's Registry has been deemed noncompliant in the following areas:

1. Alice's Registry's failure to include a link in its registration agreement to its renewal fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP");
2. Alice's Registry's failure to publish an email address to receive abuse reports on the home page of Alice's Registry's website, as required by Section 3.18.1 of the RAA;
3. Alice's Registry's failure to publish on its website a description of Alice's Registry's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;
4. Alice's Registry's failure to provide and maintain accurate and current information as specified in the Registrar Information Specification ("RIS"), as required by Section 3.17 of the RAA; and
5. Alice's Registry's failure to publish the full name and position of all officers of the registrar on Alice's Registry's website, as required by Section 3.17 of the RAA and Section 17 of the RIS of the RAA.

ICANN requests that Alice's Registry cure these breaches by 20 April 2017, 21 days from the date of this letter, by taking the following actions:

1. Provide the AuthInfo code to the RNH and allow the transfer of the domain name <analgesia.net> to another registrar, or provide a valid reason for denial;
2. Provide copies of all written communications, including time-stamped communications, between Alice's Registry and the RNH of the domain name <analgesia.net>;
3. Provide a link to the registrar's renewal fees in Alice's Registry's registration agreement;
4. Publish an email address to receive abuse reports on the home page of Alice's Registry's website;
5. Publish a description of Alice's Registry's procedures for the receipt, handling and tracking of abuse reports on Alice's Registry's website;



6. Provide ICANN with the required RIS supporting documentation, as required by Section 3.17 of the RAA;
7. Publish on Alice's Registry's website the full name and position of all officers of Alice's Registry; and
8. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that Alice's Registry will timely respond to ICANN compliance matters.

If Alice's Registry fails to timely cure the breaches and provide the information requested by 20 April 2017, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Jennifer Scott at [jennifer.scott@icann.org](mailto:jennifer.scott@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad".

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



## ATTACHMENT

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

Section I.A.1 of the TP 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 I.A.3 TP. Alice's Registry's failure to allow the transfer of the domain name <analgesia.net> or provide a valid reason for denial of transfer is a breach of Sections I.A.1 and I.A.3 of the TP.

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

Section I.A.5 of the TP requires registrars to provide the RNH with the unique AuthInfo code within five (5) calendar days of the RNH's initial request. Alice's Registry's failure to provide the AuthInfo code within five days of the RNH's request concerning domain name <analgesia.net> is a breach of Section I.A.5 of the TP.

### 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. Alice's Registry's failure to provide the requested registration records and data related to the domain name <analgesia.net> is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

### Failure to clearly display renewal fees in registration agreement

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 agreement. Alice Registry's failure to provide a link in its registration agreement to its renewal fees is a breach of Section 4.1 of the ERRP.

### 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 website an email address to receive abuse reports. Alice's Registry'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 website a description of their procedures for the receipt, handling and tracking of abuse reports. Alice's Registry'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 and maintain required contact information

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. Alice's Registry's failure to provide to ICANN and maintain accurate and current information as specified in the RIS, including current documentation demonstrating that the registrar is legally established and in good standing, is a breach of Section 3.17 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. Alice's Registry'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:**

Date of Notice	Deadline for Response	Details
1-Mar-2017	8-Mar-2017	ICANN sent 1st compliance notice via email to <a href="mailto:support@alices-registry.com">support@alices-registry.com</a> . No response received from Registrar.
9-Mar-2017	16-Mar-2017	ICANN sent 2nd compliance notice via email to <a href="mailto:support@alices-registry.com">support@alices-registry.com</a> . No response received from Registrar.
15-Mar-2017	N/A	ICANN called Primary Contact at +1 415 865 0853. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [MOBILE REDACTED] and provided Primary Contact with complaint details.



Date of Notice	Deadline for Response	Details
17-Mar-2017	24-Mar-2017	ICANN sent 3rd compliance notice via email to <a href="mailto:support@alices-registry.com">support@alices-registry.com</a> .
17-Mar-2017	N/A	ICANN sent 3rd compliance notice via fax to + 1 415 651 9645. Fax successful.
17-Mar-2017	N/A	Emails from Registrar ( <a href="mailto:support@alices-registry.com">support@alices-registry.com</a> ) insufficient to demonstrate compliance.
21-Mar-2017	24-Mar-2017	ICANN sent follow up compliance notice via email to <a href="mailto:support@alices-registry.com">support@alices-registry.com</a> . No response received from Registrar.
22-Mar-2017	N/A	ICANN called Primary Contact at +1 415 865 0853. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [MOBILE REDACTED]. ICANN left voicemail with complaint details.
29-Mar-2017	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
30-Mar-2017	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.