

21 November 2018

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

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

Paul Marvin  
GKG.NET, INC. (IANA #93)  
302 N. Bryan Ave  
Bryan TX 77803  
United States

Email: paul@gkg.net  
Fax: +1 979 314 7130

Dear Paul Marvin,

Please be advised that as of 21 November 2018, GKG.NET, INC. (“GKG.NET”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 28 July 2015 (“RAA”). This breach results from:

1. GKG.NET’s failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Please refer to the attachment for details regarding this breach.

In addition, GKG.NET has been deemed noncompliant in the following area:

1. GKG.NET’s failure to publish the full name and position of all officers of the registrar as listed in the Registrar Information Specification (“RIS”) on GKG.NET’s website, as required by Section 3.17 of the RAA and Section 17 of the RIS of the RAA.

Additional Concerns

GKG.NET has previously remediated the failure to pay past due fees.

ICANN requests that GKG.NET cure these breaches by 12 December 2018, 21 days from the date of this letter, by taking the following actions:

1. Publish on GKG.NET’s website the full name and position of all officers of GKG.NET, as specified in the RIS, or update GKG.NET’s RIS form to reflect the officer names and positions published on GKG.NET’s website;
2. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that GKG.NET will:

- a. timely and fully respond to ICANN Contractual Compliance matters;
  - b. timely make payment of its ICANN fees; and
  - c. remain in compliance for previously remediated areas of noncompliance; and
3. Pay all past and currently due accreditation fees.

If GKG.NET fails to timely cure the breaches and provide the information requested by 12 December 2018, 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,



Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

## ATTACHMENT

### 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. GKG.NET owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA. GKG.NET additionally owes currently due accreditation fees, due 30 November 2018.

### 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. GKG.NET'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:**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
21-Sep-2018 9-Oct-2018 22-Oct-2018	N/A	ICANN sent detailed customer statements to GKG.NET regarding past due fees.
6-Nov-2018	N/A	GKG.NET's past due fees were referred to ICANN Contractual Compliance.
12-Nov-2018	19-Nov-2018	ICANN sent escalated compliance notice via email to <a href="mailto:paul@gkg.net">paul@gkg.net</a> .
12-Nov-2018	N/A	ICANN sent escalated compliance notice via fax to +1 979 314 7130. Fax successful.
14-Nov-2018	N/A	ICANN called Primary Contact at mobile number [NUMBER REDACTED] and provided Primary Contact with complaint details.
14-Nov-2018	N/A	Email from Registrar ( <a href="mailto:paul@gkg.net">paul@gkg.net</a> ) insufficient to demonstrate compliance.
14-Nov-2018	19-Nov-2018	ICANN sent follow-up compliance notice via email to <a href="mailto:paul@gkg.net">paul@gkg.net</a> . No response received from Registrar.
20-Nov-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
21-Nov-2018	N/A	To date, the Registrar has not made full payment of past due fees or responded to ICANN with the requested information and the issue remains unresolved.