

20 September 2023

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

[REDACTED]
OpenTLD B.V. (IANA #1666)
[REDACTED]

Email: [REDACTED]
Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 20 September 2023, OpenTLD B.V. (“OpenTLD” or “Registrar”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 5 June 2019 (“RAA”). This breach results from:

1. OpenTLD’s failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.
2. OpenTLD’s failure to permit the Registrants at Expiration (“RAE”) to renew expired domain name registrations, as required by Section 2.2.5 of the Expired Registration Recovery Policy (“ERRP”).
3. OpenTLD’s failure to provide Registered Name Holders (RNHs) with AuthInfo codes and remove the “ClientTransferProhibited” status from domain names upon RNHs’ request, as required by Section I.A.5 of the Transfer Policy. OpenTLD also failed to provide a valid reason for denying the requests supported by the Transfer Policy.

Please refer to the attachment for details regarding this Notice of Breach.

In addition, OpenTLD has been deemed noncompliant in the following area:

1. OpenTLD’s failure to complete and deliver to ICANN a Compliance Certificate within twenty (20) days following the end of the 2022 calendar year certifying compliance with the terms and conditions of the RAA, as required by Section 3.15 of the RAA.

Additional Concerns

OpenTLD continues to exhibit the same pattern of conduct that led to the Notices of Breach issued against it by ICANN on 22 November 2017 and 27 February 2020. As detailed in the attached chronologies, ICANN sent OpenTLD multiple notices requesting registration data and records. Several attempts to speak with the Registrar by telephone were also made during which the details of the requests and a reminder of ICANN Contractual Compliance's process and approach, including the issuance of a Notice of Breach, were communicated. In many of the cases referenced in this Notice of Breach, OpenTLD informed that refunds for failed renewals were issued, that the Registrar had not received requests from the RNH to renew or transfer the domain names, or that the domain names were not transferable due to their status at the time of the request. ICANN also noted that many of these domain names were subsequently available for re-registration by the complainants. However, as ICANN has repeatedly informed the Registrar, OpenTLD has not provided sufficient evidence to demonstrate compliance with the RAA, the ERRP, and the Transfer Policy with respect to the cases listed in this Notice of Breach. ICANN requires this evidence to confirm compliance with respect to each particular case. Further, there has been no indication that the Registrar is responding to RNHs' concerns in a consistent manner. Rather, the Registrar's responses often appear to be incomplete and untimely.

Additionally, the Registrar's Registration Data Directory Services (port 43 and web-based WHOIS) may not be displaying the full WHOIS data for domain name registrations sponsored by Registrar where OpenTLD's Privacy/Proxy Service (Stichting OpenTLD WHOIS Proxy) is used as provided for in Appendix A, Section 2.6 of the Temporary Specification for gTLD Registration Data ("Temporary Specification.") It does not appear that the Registrar is complying with its obligation to implement measures consistent with the Temporary Specification as required by the Interim Registration Data Policy for gTLDs ("Interim Policy.")

Finally, OpenTLD failed to respond to ICANN Contractual Compliance's multiple follow-up questions regarding the Registrar's process and procedure for reviewing and responding to requests for access to Personal Data in Registration Data. Due to the Registrar's unresponsiveness in this regard, ICANN has been unable to confirm that OpenTLD is providing reasonable access to Personal Data in Registration Data to third parties on the basis of a legitimate interests pursued by the third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the RNH or data subject pursuant to Article 6(1)(f) of the General Data Protection Regulation (GDPR).

ICANN requests that OpenTLD cure these breaches by 11 October 2023, 21 days from the date of this letter, by taking the following actions:

1. To demonstrate OpenTLD's compliance with the ERRP:
 - a. For the domain name shared[.]hosting, provide:

- i. Evidence that the RNH/RAE was permitted, and provided with assistance, to renew/restore the expired domain name registration while the domain name was still sponsored by the Registrar.
 - ii. Evidence that the Domain Name System (DNS) resolution path was interrupted, including the date of interruption and the number of days it remained interrupted.
- b. For the domain name hkay[.]com and myagency[.]biz, provide:
 - i. Copies of the expiration renewal notices sent to the RNH/RAE pre- and post- expiration for each domain name while it was sponsored by the Registrar.
 - ii. Evidence that the RNH/RAE for each domain name was permitted, and provided with assistance, to renew/restore the expired domain name registration while the domain name was still sponsored by the Registrar.
 - iii. Evidence that the DNS resolution path for each domain name was interrupted, including the date of interruption and the number of days it remained interrupted.
 - iv. Evidence of the date the Registrar sent a delete command to the registry operator / the domain name entered the Redemption Grace Period (“RGP”) for each domain name.
- c. For the domain names productosion[.]com, whole-bitcoin[.]com, bitcoinbycrypto[.]com, dealbuybitcoin[.]com, tradebybitcoin[.]com, goldluxurydrinks[.]com, dealbynft[.]com, tradebynft[.]com and abittanconsulting[.]com, and car-scrappage[.]com, provide:
 - i. A copy of the following registration data prior to the expiration of the domain name registration and after any changes after expiration, while each domain name was still sponsored by OpenTLD:
 - Domain Name
 - Updated Date
 - Creation Date
 - Registrar Registration Expiration Date
 - Registrar
 - Registrar IANA ID
 - Reseller
 - Domain Status
 - Registrant Name
 - Registrant Organization

Registrant Email
Name Server

- ii. Copies of the expiration renewal notices sent to the RNH/RAE pre- and post- expiration for each domain name while it was sponsored by the Registrar.
 - iii. Evidence that the RNH/RAE for each domain name was permitted, and provided with assistance, to renew/restore the expired domain name registration while the domain name was still sponsored by OpenTLD.
 - iv. Evidence that the DNS resolution path for each domain name was interrupted, including the date of interruption and the number of days it remained interrupted.
 - v. Copies of any communications between OpenTLD and the RNH/RAE, or its authorized representative, relating to renewal of the domain name.
- d. For the domain name `tweaky[.]biz`, provide:
- i. A copy of the following registration data prior to the expiration of the domain name registration and after any changes after expiration, while it was still sponsored by OpenTLD:
 - Domain Name
 - Updated Date
 - Creation Date
 - Registrar Registration Expiration Date
 - Registrar
 - Registrar IANA ID
 - Reseller
 - Domain Status
 - Registrant Name
 - Registrant Organization
 - Registrant Email
 - Name Server
 - ii. Copies of the expiration renewal notices sent to the RNH/RAE pre- and post- expiration for the domain name while it was sponsored by the Registrar.
 - iii. Evidence that the RNH/RAE for the domain name was permitted, and provided with assistance, to renew/restore the expired domain name registration while the domain name was still sponsored by OpenTLD.
 - iv. Copies of any communications between OpenTLD and the RNH/RAE, or its authorized representative, relating to renewal of the domain name.

- v. Evidence that the RNH/RAE was permitted, and provided with assistance, to renew/restore the expired domain name registration while the domain name was still sponsored by the Registrar.
- e. For the domain name zulc22[.]com, provide:
 - i. Copies of the expiration renewal notices sent to the RNH/RAE pre- and post- expiration while it was sponsored by the Registrar.
 - ii. Evidence that the DNS resolution path was interrupted, including the date of interruption and the number of days it remained interrupted.
- f. For the domain name rito[.]click, provide:
 - i. Evidence that the RNH/RAE was permitted, and provided with assistance, to renew/restore the expired domain name registration, and that the renewal has been reflected in the Registrar's Registration Data Directory Service ("RDDS").
- g. If OpenTLD is unable to provide the records, information, and data in items 1a through 1f above, please describe in detail the corrective and preventative action(s) that OpenTLD will take, with implementation date(s), to ensure compliance with the renewal of registration requirements set forth in the ERRP and the RAA, including:
 - i. Permitting RNHs/RAEs to renew expired registrations beginning at the time of expiration and through the DNS resolution interruption period described in ERRP Sections 2.2.2 – 2.2.3, as required by Section 2.2.5 of the ERRP.
 - ii. Permitting RNHs/RAEs to redeem deleted registrations during RGP, as required by Section 3.3. of the ERRP.
 - iii. Providing renewal reminder notifications at the prescribed time periods, as required by Section 2.1 of the ERRP.
 - iv. Providing all related records and registration data to ICANN upon reasonable notice, as required by Section 3.4 of the RAA.

2. To demonstrate OpenTLD's compliance with the Transfer Policy:

- a. For the domain name tweaky[.]biz, provide:

- i. Evidence that while the domain name was registered with OpenTLD, the Registrar complied with all applicable requirements related to allowing the RNH to transfer the domain name to a different registrar, including with respect to the removal of the “ClientTransferProhibited” status upon RNH’s request (Section I.A.5 of the Transfer Policy). If the Registrar denied a transfer request involving this domain name based on a valid reason for denial consistent with Section I.A.3 of the Transfer Policy, provide the specific reason and all pertinent evidence.
 - ii. Copies of all correspondence, including time-stamped communications, between OpenTLD and the RNH of the domain name, or authorized representative, related to the removal of the “ClientTransferProhibited” status, provision of the AuthInfo code, and transfer requests.
- b. For the domain name rito[.]click, provide:
- i. Evidence that the RNH was/has been provided with facilities to generate and manage the AuthInfo code and to remove the “ClientTransferProhibited” status, and with assistance to transfer the domain name to another registrar.
 - ii. Copies of all correspondence, including time-stamped communications, between OpenTLD and the RNH of the domain name, or authorized representative, related to the removal of the “ClientTransferProhibited” status, provision of the AuthInfo code, and transfer requests.
- c. For the domain name rowansc1[.]com, provide:
- i. Evidence that while the domain name was registered with OpenTLD, the Registrar complied with all applicable requirements related to allowing the RNH to transfer the domain name to a different registrar, including with respect to the removal of the “ClientTransferProhibited” status upon RNH’s request (Section I.A.5 of the Transfer Policy). If the Registrar denied a transfer request involving this domain name based on a valid reason for denial consistent with Section I.A.3 of the Transfer Policy, provide the specific reason and all pertinent evidence.
 - ii. Or, in the alternative:
 - 1. Evidence that the domain name was deleted by OpenTLD and had entered in RGP before the RNH submitted an AuthInfo code request to the Registrar.

2. Evidence that the DNS resolution path was interrupted, as required by the ERRP, including the dates of interruption and the number of days it remained interrupted.
 - d. If OpenTLD is unable to provide the records, information, and data in items 2a through 2c above, explain the corrective and preventative action(s) that OpenTLD will take, with implementation date(s), to ensure (1) compliance with the transfer requirements set forth in the Transfer Policy related to the provision of the AuthInfo code and the removal of the “ClientTransferProhibited” status; and (2) that the Registrar provides all related records and registration data to ICANN upon reasonable notices, as required by Section 3.4 of the RAA.
3. For the domain names sharkeventos502[.]com and smartglobus[.]com, provide all pertinent registration data and records relating to OpenTLD’s dealings with the RNH(s) that:
 - a. Confirm whether OpenTLD suspended the registration of the domain names due to the RNH or Account Holder's failure to respond to a registration data inquiry for over fifteen (15) calendar days, or for some other reason (and if so, what that other reason was).
 - b. Include copies of all correspondence, including time-stamped communications, between OpenTLD and the RNH of the domain name, or Account Holder, if different, related to any registration data inquiry.
4. Demonstrate that OpenTLD is displaying the full WHOIS data in its RDDS for domain name registrations sponsored by the Registrar where OpenTLD’s Privacy/Proxy Service is used, as required by the Interim Policy.
5. Provide a detailed explanation of OpenTLD’s process and procedure for reviewing and responding to requests for access to Personal Data in Registration Data, compliant with Appendix A, Section 4.1 of the Temporary Specification.
6. After curing all items in this Notice of Breach, provide a certificate executed by the president, chief executive officer, chief financial officer, or chief operating officer (or their equivalents) certifying compliance with the terms and conditions of the RAA.
7. Provide ICANN with the corrective and preventative action(s) that OpenTLD will take, with implementation date(s), to address its pattern of untimely, incomplete and nonresponse to ICANN Contractual Compliance matters, beyond those previously provided to cure the 22 November 2017 and 27 February 2020 Notices of Breach.

Failure to cure the Notice of Breach and provide the information requested by 11 October 2023 will allow ICANN to begin the process to terminate Open TLD’s Registrar Accreditation.

If you have questions or require assistance, please contact Leticia Castillo (EMAIL REDACTED) and Amanda Rose (EMAIL REDACTED).

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund
Senior Vice President, Contractual Compliance and U.S. Government Engagement

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to make Registered Name Holder and registration 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. OpenTLD's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of 3.4.3 of the RAA.

Failure to permit renewal

Section 2.2.5 of the ERRP requires registrars to permit the RAE to renew an expired domain name registration beginning at the time of expiration and through the DNS resolution interruption period described in paragraphs 2.2.2 and 2.2.3 of the ERRP. OpenTLD's failure to permit RAEs related to the relevant domain names in the compliance notices detailed in the relevant chronologies below is a breach of Section 2.2.5 of the ERRP.

Failure to provide AuthInfo code and remove the "ClientTransferProhibited" status within five calendar days of RNH request

Section I.A.5 of the Transfer Policy requires registrars to provide the RNH with the unique AuthInfo code and remove the "ClientTransferProhibited" status within five (5) calendar days of the RNH's initial request, subject to ICANN specifications or policies and any applicable laws or regulations. OpenTLD's failure to provide the AuthInfo code and/or remove the aforementioned status within five days of the RNH's request concerning the relevant domain names in the chronologies below is a breach of Section I.A.5 of the Transfer Policy.

CHRONOLOGIES

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified OpenTLD of the violations associated with each case, including the affected domain names and the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from OpenTLD to become compliant. All inquiries/notices subsequent to each 1st inquiry/notice constituted an additional attempt by ICANN to obtain evidence of compliance from OpenTLD. All telephone call details below described further attempts from ICANN to communicate to OpenTLD the details of the cases and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist OpenTLD in becoming compliant and assist the relevant RNHs. All these attempts were unsuccessful.

Chronology (Case#01240612):

Date of Notice	Deadline for Response	Details
1-Aug-2023	8-Aug-2023	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED]

Date of Notice	Deadline for Response	Details
		and [EMAIL REDACTED]. No response received from the Registrar.
11-Aug-2023	18-Aug-2023	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
11-Aug-2023	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
25-Aug-2023	1-Sep-2023	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
25-Aug-2023	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
25-Aug-2023	N/A	ICANN called Compliance and Primary Contact at TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at TELEPHONE REDACTED] and left voicemail with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01240475):

Date of Notice	Deadline for Response	Details
1-Aug-2023	8-Aug-2023	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
10-Aug-2023	17-Aug-2023	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
11-Aug-2023	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
23-Aug-2023	30-Aug-2023	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
23-Aug-2023	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
25-Aug-2023	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01200851):

Date of Notice	Deadline for Response	Details
24-Feb-2023	24-Feb-2023	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
1-Mar-2023	8-Mar-2023	ICANN re-sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
29-Mar-2023	5-Apr-2023	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
4-Apr-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Jul-2023	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
7-Aug-2023	14-Aug-2023	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
11-Aug-2023	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01194162):

Date of Notice	Deadline for Response	Details
21-Jan-2023	30-Jan-2023	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
1-Feb-2023	8-Feb-2023	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
8-Feb-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
20-Feb-2023	27-Feb-2023	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
20-Feb-2023	27-Feb-2023	ICANN re-sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
23-Feb-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01191415):

Date of Notice	Deadline for Response	Details
9-Jan-2023	16-Jan-2023	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from the Registrar.
18-Jan-2023	25-Jan-2023	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
28-Jan-2023	4-Feb-2023	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED].
28-Jan-2023	4-Feb-2023	ICANN re-sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
8-Feb-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
2-Mar-2023	9-Mar-2023	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
9-Mar-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
9-Mar-2023	9-Mar-2023	ICANN re-sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01179730):

Date of Notice	Deadline for Response	Details
18-Nov-2022	25-Nov-2022	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
9-Dec-2022	16-Dec-2022	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].

Date of Notice	Deadline for Response	Details
13-Dec-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
30-Dec-2022	N/A	Email from the Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
13-Jan-2023	20-Jan-2023	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
6-Feb-2023	13-Feb-2023	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
6-Feb-2023	N/A	ICANN sent 3rd compliance inquiry via fax to [FAX NUMBER REDACTED]. Fax unsuccessful.
8-Feb-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
28-Feb-2023	7-Mar-2023	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
15-Mar-2023	22-Mar-2023	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
23-Mar-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
29-Mar-2023	5-Apr-2023	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
29-Mar-2023	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED] successful.
4-Apr-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01138244):

Date of Notice	Deadline for Response	Details
14-Jul-2022	21-Jul-2022	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
22-Jul-2022	29-Jul-2022	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
2-Aug-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and left voicemail with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
2-Aug-2022	2-Aug-2022	ICANN re-sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
4-Aug-2022	11-Aug-2022	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
4-Aug-2022	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
9-Aug-2022	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
23-Aug-2022	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.
30-Aug-2022	N/A	ICANN confirmed receipt of the Registrar's response via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
7-Oct-2022	7-Oct-2022	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. The Registrar had previously provided information about the refunds issued to the complainant for the failed renewal. Further, the domain name later became available for re-registration (as ICANN informed the complainant). However, OpenTLD had failed to provide all records and information ICANN had requested under the RAA and ERRP.
11-Oct-2022	18-Oct-2022	ICANN re-sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].

Date of Notice	Deadline for Response	Details
11-Oct-2022	18-Oct-2022	ICANN re-sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep- 2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01133505):

Date of Notice	Deadline for Response	Details
16-Jun-2022	23-Jun-2022	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
1-Jul-2022	8-Jul-2022	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
7-Jul-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
15-Jul-2022	22-Jul-2022	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], and [EMAIL REDACTED].
15-Jul-2022	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
18-Jul-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Jul-2022	22-July-2022	ICANN re-sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], and [EMAIL REDACTED].
27-Jul-2022	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
8-Aug-2022	N/A	ICANN confirmed receipt of the Registrar's response via email to [EMAIL REDACTED].
13-Sep-2022	20-Sep-2022	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], and [EMAIL REDACTED]. No response received from the Registrar.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01132171):

Date of Notice	Deadline for Response	Details
14-Jun-2022	21-Jun-2022	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
23-Jun-2022	30-Jun-2022	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
30-Jun-2022	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
30-Jun-2022	30-Jun-2022	ICANN re-sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
30-Jun-2022	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.
4-Jul-2022	5-Jul-2022	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
6-Jul-2022	13-Jul-2022	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
6-Jul-2022	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.

Date of Notice	Deadline for Response	Details
7-Jul-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01122659):

Date of Notice	Deadline for Response	Details
20-Apr-2022	27-Apr-2022	ICANN sent 1st compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
28-Apr-2022	5-May-2022	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
29-Apr-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
11-May-2022	18-May-2022	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
11-May-2022	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
18-May-2022	N/A	ICANN called Compliance and Primary Contact at TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
2-Jun-2022	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
28-Jun-2022	28-Jun-2022	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. The Registrar had previously provided information about the refunds issued to the complainant for the failed renewal. Further, the domain name later became available for re-registration. However, OpenTLD had failed to provide all records and information ICANN had requested under the RAA and ERRP.
28-Jun-2022	5-Jul-2022	ICANN re-sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
4-Aug-2023	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.
30-Aug-2023	6-Sept-2023	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED].
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation.

Chronology (Case#01111035):

Date of Notice	Deadline for Response	Details
22-Feb-2022	1-Mar-2022	ICANN sent 1st compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
9-Mar-2022	16-Mar-2022	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
15-Mar-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
21-Mar-2022	28-Mar-2022	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
21-Mar-2022	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
25-Mar-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
4-Aug-2023	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.
12-Sep-2023	19-Sep-2023	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED], and [EMAIL REDACTED]. No response received from the Registrar.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.

Chronology (Case#01102281):

Date of Notice	Deadline for Response	Details
20-Jan-2022	27-Jan-2022	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
4-Feb-2022	11-Feb-2022	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED].
11-Feb-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
11-Feb-2022	N/A	Email from the Registrar (EMAIL REDACTED) insufficient to demonstrate compliance.
15-Feb-2022	N/A	ICANN confirmed receipt of the Registrar's response via email to [EMAIL REDACTED].
7-Mar-2022	14-Mar-2022	ICANN sent follow-up compliance notice to via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
24-Mar-2022	31-Mar-2022	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
24-Mar-2022	N/A	ICANN sent 3rd compliance notice via fax to [FAX NUMBER REDACTED]. Fax successful.
25-Mar-2022	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Jul-2023	N/A	ICANN called Registrar Representative at [TELEPHONE REDACTED] and provided Registrar Representative with complaint details.
15-Sep-2023	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
20-Sep-2023	N/A	To date, the Registrar has not responded to ICANN.