



The Internet Corporation for Assigned Names and Numbers

10 August 2016

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Young-Ok Park
Netpia.com, Inc. (IANA #130)
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RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Yong-Ok Park,

Please be advised that as of 11 August 2016, Netpia.com, Inc. ("Netpia.com") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 18 January 2015 ("RAA"). This breach results from:

1. Netpia.com's failure to take reasonable steps to investigate and correct claimed Whois inaccuracies regarding the domain name <daedongfan.com>, as required by Section 3.7.8 of the RAA;
2. Netpia.com's failure to maintain and make available to ICANN registration data and records relating to dealings with the Registered Name Holder ("RNH") of the domain name <daedongfan.com>, as required by Sections 3.4.2 and 3.4.3 of the RAA; and
3. Netpia.com's failure to validate and verify Whois contact information, as required by Sections 2 and 4 of the Whois Accuracy Program Specification ("WAPS") of the RAA.

Please refer to the attachment for details regarding these breaches.

In addition, Netpia.com has been deemed noncompliant in the following areas:

Los Angeles 12025 Waterfront Drive, Suite 300 Los Angeles, CA 90094 USA T +1 310 301 5800 F +1 310 823-8649
Offices: Beijing • Brussels • Istanbul • Montevideo • Singapore • Washington

<http://icann.org>



1. Netpia.com's failure to provide domain name data in the specified response format, as required by Section 1.4 of the Registration Data Directory Service (Whois) Specification of the RAA ("Whois Specification");
2. Netpia.com's failure to clearly display on Netpia.com's website, and include a link in its registration agreement, to its renewal fees and post-expiration renewal fees (if different), as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP");
3. Netpia.com's failure to publish the full name and position of all officers of the registrar on Netpia.com's website, as required by Section 3.17 of the RAA and Section 17 of the Registrar Information Specification ("RIS") of the RAA;
4. Netpia.com's failure to publish an email address to receive abuse reports, on the home page of Netpia.com's website, as required by Section 3.18.1 of the RAA;
5. Netpia.com's failure to publish on its website a description of Netpia.com's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA; and
6. Netpia.com's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Additional Concerns

During the processing of this matter, ICANN was unable to reach Netpia.com's Primary Contact at the telephone numbers provided for that contact.

ICANN requests that Netpia.com cure these breaches by 31 August 2016, 21 days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Netpia.com took reasonable steps to investigate and, where applicable, correct the Whois inaccuracy concerning the domain name <daedongfan.com>. This includes: (a) copies of Netpia.com's correspondence with the RNH while investigating the Whois inaccuracy claims (including dates, times, means of inquiries, telephone numbers, e-mail addresses and postal addresses used), (b) the steps Netpia.com took to verify and validate the Whois information and (c) confirmation steps taken to resolve this matter will also apply to all existing and future Whois inaccuracy complaints;



2. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification;
3. Clearly display a link to renewal fees and post-expiration renewal fees (if different) on Netpia.com's website and provide a link to the renewal fees and post-expiration renewal fees (if different) in Netpia.com's registration agreement;
4. Publish on Netpia.com's website the full name and position of all officers of Netpia.com;
5. Publish an email address to receive abuse reports on the home page of Netpia.com's website;
6. Publish a description of Netpia.com's procedures for the receipt, handling and tracking of abuse reports on Netpia.com's website;
7. Provide ICANN with accurate and current contact information by updating RADAR, as applicable; and
8. Pay all past and currently due accreditation fees.

If Netpia.com fails to timely cure the breaches and provide the information requested by 31 August 2016, ICANN may commence the RAA 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", is written over a light blue circular watermark.

Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



ATTACHMENT

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. Netpia.com'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 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. Netpia.com's failure to provide the requested registration records and data related to the domain name <daedongfan.com> is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to validate and verify Whois data

Section 1 of the WAPS of the RAA requires registrars to validate that required fields, including telephone numbers, postal addresses and email addresses, are in a standard format or template, as well as verify the email address of the registrant by receiving an affirmative response from the registrant.

Section 2 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 receives changes to any Whois contact information, whether the contact information was previously verified or validated. The registrar is required to (1) receive an affirmative response from the registrant, (2) manually verify the information or (3) suspend the domain name.

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.



Netpia.com's failure to provide documents and information demonstrating validation and verification of the Whois data for the domain name <daedongfan.com> is a breach of the WAPS of the RAA.

Failure to display required Whois format

Section 1.4 of the Whois Specification of the RAA requires registrars to display domain name data in a specified format for Whois query responses. The format of responses shall contain all the elements and follow a semi-free text format outlined in Section 1.4 of the Whois Specification. Netpia.com's failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA.

Failure to clearly display a link to renewal fees and post-expiration renewal fees (if different) on registrar's website

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. Netpia.com's failure to provide a link or clearly display its renewal fees and post-expiration renewal fees (if different) is a breach of Section 4.1 of the ERRP.

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. Netpia.com'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.

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. Netpia.com'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. Netpia.com'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 pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Netpia.com owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA. Netpia.com additionally owes currently due accreditation fees, due 30 August 2016.

Chronology:

Date of Notice	Deadline for Response	Details
30-Jun-2016	21-Jul-2016	ICANN sent 1st compliance notice via email to webmaster@ibi.net .
12-Jul-2016	N/A	Email from Registrar (webmaster@ibi.net) insufficient to demonstrate compliance.
12-Jul-2016	21-Jul-2016	ICANN sent follow-up compliance notice via email to webmaster@ibi.net . No response received from Registrar.
22-Jul-2016	29-Jul-2016	ICANN sent 2nd compliance notice via email to webmaster@ibi.net .
26-Jul-2016	N/A	ICANN called Primary Contact at +82 2 2165 9212 and at mobile number [NUMBER REDACTED]. No answer and no ability to leave a message. ICANN called Registrar Representative at +82 2 1644 5001. No answer and no ability to leave a message.
27-Jul-2016	N/A	Email from Registrar (webmaster@ibi.net) insufficient to demonstrate compliance.
27-Jul-2016	29-Jul-2016	ICANN sent follow-up compliance notice via email to webmaster@ibi.net .
28-Jul-2016	N/A	Email from Registrar (webmaster@ibi.net) insufficient to demonstrate compliance.
28-Jul-2016	29-Jul-2016	ICANN sent follow-up compliance notice via email to webmaster@ibi.net . No response received from Registrar.
1-Aug-2016	8-Aug-2016	ICANN sent 3rd compliance notice via email to webmaster@ibi.net and admin@ibi.net . No response received from Registrar.

Date of Notice	Deadline for Response	Details
1-Aug-2016	N/A	ICANN sent 3rd compliance notice via fax to +82 2 2672 6060. Fax successful.
5-Aug-2016	N/A	ICANN called Primary Contact at +82 2 2165 9212 and at mobile number [NUMBER REDACTED]. No answer and no ability to leave a message. ICANN called Registrar Representative at +82 2 1644 5001. No answer and no ability to leave a message. ICANN spoke with Primary Contact at +82 2 2165 3040 and provided complaint details.
5-Aug-2016	8-Aug-2016	ICANN re-sent 3rd compliance notice via email to cdms@ibi.net , webmaster@ibi.net and admin@ibi.net . No response received from Registrar.
9-Aug-2016	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Aug-2016	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.