



The Internet Corporation for Assigned Names and Numbers

TRANSMITTED VIA FACSIMILE, ELECTRONIC MAIL AND COURIER

7 November 2011

Mr. Serdar Acir
Alantron Bilişim Ltd Şti. (IANA ID 898)
KOU Teknopark YeniKoy Yerleskesi D2 Izmit
Kocaeli Kocaeli 41200
Turkey

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Mr. Acir:

Please be advised that as of the date of this letter, Alantron Bilişim Ltd Şti. ("Alantron") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN"), dated 22 March 2010 ("RAA"). These breaches result from:

1. Alantron's failure to maintain registration records pursuant to Section 3.4 of the RAA; and
2. Alantron's failure to make registration records available for inspection and copying upon reasonable notice by ICANN, pursuant to Section 3.4 of the RAA.

Please refer to the attachment below for details regarding these breaches. We request that Alantron cure these breaches within 15 working days from the date of this letter by:

1. retaining required registration records; and
2. making registration records available for inspection and copying by ICANN or providing ICANN with electronic copies of the requested registration records.

If Alantron fails to cure these breaches, ICANN may commence the termination process.

Brussels
Sydney
Washington, DC
Marina del Rey

6 Rond Point Schuman, Bl. 5
Level 2, 48 Hunter Street
1875 I Street, NW, 5th Floor
4676 Admiralty Way, Suite 330

B-1040 Brussels
Sydney NSW 2000
Washington, DC 20006
Marina del Rey, CA 90292

BELGIUM
AUSTRALIA
USA
USA

T +32 2 234 7870
T +61 2 8236 7900
T +1 202 429 2704
T +1 310 823 9358

F +32 2 234 7848
F +61 2 8236 7913
F +1 202 429 2714
F +1 310 823 8649

<http://icann.org>



Mr. Serdar Acir – Notice of Breach
Alantron Bilişim Ltd Şti.
Page 2 of 6

If you have questions or require assistance, please contact me at stacy.burnette@icann.org.

Sincerely,

A handwritten signature in blue ink that reads "Stacy Burnette".

Stacy Burnette
Director
Contractual Compliance

ATTACHMENT

1. Failure to Retain Registered Name Holder and Registration Data and Failure to Make Such Data Available for Inspection and Copying

Section 3.4 of the RAA requires registrars to maintain registered name holder and registration data and make those records available for inspection and copying upon reasonable notice by ICANN. On 12 October 2011, ICANN requested that Alantron make registration records available to ICANN concerning a specific domain name, as ICANN received a complaint that there was no Whois output available for the domain name. Although numerous requests were made by ICANN to make the registration records available for inspection and copying, as of the date of this letter, Alantron has not made any arrangements to comply with ICANN's request.

Notices requesting Alantron make registration records available for inspection and copying were transmitted to Alantron on 12 October 2011, 20 October 2011, 27 October 2011 and 2 November 2011.

Because Alantron failed to cooperate concerning ICANN's request for registration records, ICANN can only conclude that Alantron failed to maintain registration records as required by Section 3.4.2 of the RAA. Alantron's failure to make arrangements to make the requested registration records available for inspection and copying by ICANN is a separate breach of Section 3.4.3 of the RAA.

2. Other Concerns Regarding Alantron's Failure to Provide Public Access to Data on Registered Names

Section 3.3 of the RAA requires Alantron to provide an interactive web page and a port 43 Whois service providing free public query-based access to up-to date (i.e., updated



at least daily) data concerning all active registered names sponsored by Alantron for each TLD in which it is accredited.

ICANN provided several notices to Alantron concerning the unavailability of public access to data on registered names sponsored by Alantron beginning 1 September 2011. Specifically, ICANN informed Alantron that its port 43 Whois service was not operational, its web-based Whois service was not operational and its Whois data was incomplete (hidden e-mail addresses and lack of registrant contact fields).

Additionally, after receiving a complaint regarding a specific domain name, ICANN requested that Alantron correct Whois violations concerning that domain name. While it appears Alantron corrected these Whois related contract violations, its corrective actions were not taken within the specified timeframe. From the chronology below, it is clear that numerous communications between ICANN staff and Alantron representatives via telephone, email and facsimile were required before Alantron took corrective action.

Be advised that ICANN may suspend a registrar's ability to create new Registered Names or initiate inbound transfers of Registered Names for one or more TLDs for up to a twelve (12) month period if a registrar has been repeatedly and willfully in fundamental and material breach of its obligations at least three (3) times within any twelve (12) month period.

Below is a chronology of our correspondence and other attempts to contact Alantron date:

1 Sept 2011	Compliance staff sent Port 43 Whois inquiry to primary contact of registrar, Serdar Acir, at serdaracir@alantron.com , concerning port 43 access issues.
6 Sept 2011	Upon review, it was noted by Compliance staff that the registrar appeared to have resolved port 43 access issues.
15 Sept 2011	Compliance staff sent second notice concerning web-based Whois/Port 43 issues to primary contact of registrar, Serdar Acir, at serdaracir@alantron.com . Requested phone call.
16 Sept 2011	Mr. Acir contacted Compliance staff claiming Whois servers were working properly, and requested further information. Compliance staff provided information regarding Port 43 and web-based Whois concerns.
16 Sept 2011	Mr. Acir contacted Compliance staff via e-mail confirming phone call and plan to identify and resolve web-based Whois/port 43 issues.



20 Sept 2011	Mr. Acir contacted Compliance staff claiming to have resolved port 43 failures by preventing rate-limiting.
21 Sept 2011	Compliance staff sent Mr. Acir a notice to serdaracir@alantron.com acknowledging resolution of port 43 issues, but detailing further issues with web-based Whois output, including hidden email address formats and lack of “Registrant” contact fields.
23 Sept 2011	Mr. Acir contacted Compliance staff stating they will add “Registrant” contact field to web-based Whois output, but asserts the hidden email addresses are an optional privacy protection for registrants.
29 Sept 2011	Compliance staff sent Mr. Acir a notice to serdaracir@alantron.com citing RAA section 3.3 as requiring a valid email address for technical and administrative contacts for the registered name holder in Whois output. No response was received and issue did not appear resolved.
6 Oct 2011	Compliance staff sent Mr. Acir another notice to serdaracir@alantron.com citing section 3.3 as requiring a valid email address for technical and administrative contacts for the registered name holder in Whois output. No response was received and issue did not appear resolved.
12 Oct 2011	Compliance staff sent Mr. Acir a notice to serdaracir@alantron.com acknowledging the hidden email contacts had been resolved in the Web-based Whois output, but not the port 43 output, and requested resolution of all Whois issues. No response was received and issue did not appear resolved.
12 Oct 2011 (1 st Inquiry)	After receiving a complaint regarding a specific domain name under Alantron’s management, Compliance staff sent Mr. Acir a notice to serdaracir@alantron.com requesting Alantron address Whois output issues concerning this domain name. Additionally, ICANN requested access to registration records concerning the domain name pursuant to section 3.4.2. No response was received and the issues did not appear resolved.
18 Oct 2011 (2 nd Inquiry)	Compliance staff sent Mr. Acir a notice to serdaracir@alantron.com further outlining Whois data output issues concerning the domain name that is the subject of a recent complaint and requested a phone call.
20 Oct 2011 (1 st Call)	Compliance staff spoke to Mr. Acir via mobile phone concerning the outstanding Whois issues, including hidden email contacts and the Whois output concerning the domain name that is the subject of a complaint, as well as the registration records concerning this



	domain name.
20 Oct 2011	Compliance staff sent Mr. Acir a notice to serdaracir@alantron.com reiterating the issues discussed over the phone and ICANN's expectations for resolution. No response was received. Hidden email contact issue appeared to have been addressed, but Whois output still not available for a specific domain name that is the subject of a complaint and registration records still not received or made available for inspection or copying.
25 Oct 2011	Compliance staff attempted to call Mr. Acir via office and mobile phone, but was not successful.
25 Oct 2011	Compliance staff attempted to call Mr. Acir via mobile phone, but was not successful.
26 Oct 2011	Compliance staff attempted to call Mr. Acir via mobile phone, but was not successful.
27 Oct 2011 (Final Warning)	Compliance staff sent Mr. Acir a final warning notice to serdaracir@alantron.com , referencing inability to access Whois data for a specific domain name that is the subject of a complaint and failure to make registration records available with a requested response date of 1 Nov 2011. Final warning was also faxed to the primary contact fax number.
28 Oct 2011	Registrar employee requested the final warning notice be re-faxed as the first copy did not completely transfer.
28 Oct 2011	Compliance staff re-faxed copy of final warning notice.
28 Oct 2011	Compliance staff notified registrar employee that final warning notice was re-faxed, and included the notice within the response.
30 Oct 2011	Mr. Acir contacted Compliance staff stating they believed the issue to have been resolved and modification was made to their Whois server.
31 Oct 2011 (2 nd Call)	Compliance staff spoke to Mr. Acir via mobile phone acknowledging the port 43 displays Whois data for the domain name that is the subject of a complaint but the web-based Whois output does not. Failure to make registration records available was also discussed by ICANN. Registrar claims web-based Whois output will be updated shortly, and will also send response concerning registration records.
2 Nov 2011	Compliance staff sent an email to Mr. Acir urging him to address the web-based Whois service issue and make registration data available as requested by ICANN.
2 Nov 2011	Mr. Acir responded to Compliance staff's email advising the Whois issue was fixed and the requested data will be provided to ICANN



Mr. Serdar Acir – Notice of Breach
Alantron Bilişim Ltd Şti.
Page 6 of 6

	as soon as he receives it.
--	----------------------------