

\$\mathbb{Q}\$ 12025 Waterfront Drive, Suite 300 Los Angeles, CA 90094-2536 USA

+1 310 301 5800

+1 310 823 8649

25 August 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF TERMINATION OF REGISTRAR ACCREDITATION AGREEMENT

Murat Yaniklar Ground Internet, Inc. (IANA #936) Uludag Universitesi Ulutek Teknoloji Merkezi TURKTICARET.Net Ofisi, Nilufer Bursa 16059 Turkey

Email: info@groundinternet.com

Fax: +90 224 2249520

Dear Mr. Yaniklar,

Please be advised that as of 25 August 2017, Ground Internet, Inc.'s ("Ground Internet") 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 25 September 2014 ("RAA") is terminated pursuant to Section 5.5.4 of the RAA. The termination shall become effective 22 September 2017, 28 calendar days from the date of this notice.

The termination is due to Ground Internet's failure to timely cure the breaches by 26 July 2017 as set forth in ICANN's notice of breach of RAA dated 5 July 2017. As of 25 August 2017, the following breaches remain:

- Ground Internet's failure to provide an interactive webpage and a port 43 Whois service
 providing free public query-based access to up-to-date data concerning all active
 registered names sponsored by Ground Internet for each top-level domain ("TLD") in
 which it is accredited, as required by Section 3.3.1 of the RAA;
- 2. Ground Internet's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA; and
- 3. Ground Internet's failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Please see the chronology below for additional details.

Ground Internet is further advised that the logo license granted in the Logo License Specification to the RAA is revoked as of 22 September 2017. Please remove all ICANN trademarks, name and logo from Ground Internet's website and business materials that have been licensed to Ground Internet under the terms of that Specification by 22 September 2017.



Domain Name Transition Process

To protect domain name registrants, ICANN will commence the domain name transition process and will solicit bids for a qualified ICANN-accredited registrar to manage the domain names currently managed by Ground Internet.

ICANN will follow the <u>De-Accredited Registrar Transition Procedure</u> ("Procedure"). Consistent with the Procedure, please designate a bulk transfer recipient by 1 September 2017 and inform ICANN's Registrar Liaison Team at RegTransition@icann.org.

ICANN reserves all its rights under the RAA. Please note the rights and obligations required to have effect after the expiration of the RAA, including but not limited to Sections 3.4 Retention of Registered Name Holder and Registration Data, 3.9 Accreditation Fees, 5.8 Resolution of Disputes Under this Agreement, and 5.9 Limitations on Monetary Remedies for Violations of this Agreement.

Ground Internet has current and past due accreditation fees. These fees are required to be paid to ICANN by Section 3.9 of the RAA. Please immediately submit payment to ICANN.

If you have questions or require assistance, please contact Jennifer Scott at jennifer.scott@icann.org.

Sincerely,

Maguy Serad Vice President

Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



Chronology:

Date of Notice	Deadline for Response	Details
21-May-2017	29-May-2017	ICANN sent 1st compliance notice via email to info@groundinternet.com . No response received from Registrar.
30-May-2017	6-Jun-2017	ICANN sent 2nd compliance notice via email to info@groundinternet.com . No response received from Registrar.
6-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and provided Registrar Representative with complaint details.
12-Jun-2017	19-Jun-2017	ICANN sent 3rd compliance notice via email to info@groundinternet.com .
12-Jun-2017	N/A	ICANN sent 3rd compliance notice via fax to +90 224 2249520. Fax successful.
14-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and provided Registrar Representative with complaint details.
19-Jun-2017	N/A	Email from Registrar <u>info@groundinternet.com</u> insufficient to demonstrate compliance.
20-Jun-2017	27-Jun-2017	ICANN sent follow-up compliance notice via email to info@groundinternet.com . No response received from Registrar.
20-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and at mobile number [NUMBER REDACTED]. No answer and no ability to leave a voicemail.
23-Jun-2017	N/A	ICANN called Primary Contact at +90 224 2248640 and at mobile number [NUMBER REDACTED] and provided Registrar Representative with complaint details.
28-Jun-2017	N/A	Registrar Representative called ICANN via +90 224 2248640. ICANN provided Registrar Representative with complaint details.
3-Jul-2017	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
5-Jul-2017	26-Jul-2017	ICANN issues Notice of Breach to Registrar.
6-Jul-2017	N/A	ICANN sent Notice of Breach via fax to +90 224 2249520. Fax unsuccessful.
6-Jul-2017	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
12-Jul-2017	26-Jul-2017	ICANN sent follow-up notice via email to info@groundinternet.com . No response received from Registrar.
19-Jul-2017	26-Jul-2017	ICANN sent reminder notice via email to info@groundinternet.com .



Date of Notice	Deadline for Response	Details
25-Jul-2017	N/A	Email from Registrar (info@groundinternet.com) insufficient to demonstrate compliance.
25-Jul-2017	26-Jul-2017	ICANN sent follow-up notice via email to info@groundinternet.com.
26-Jul-2017	N/A	Email from Registrar (info@groundinternet.com) requesting an extension.
26-Jul-2017	2-Aug-2017	ICANN approved an extension via email to info@groundinternet.com.
26-Jul-2017	N/A	Email from Registrar (info@groundinternet.com) acknowledging extension approval.
3-Aug-2017	10-Aug-2017	ICANN approved an extension via email to info@groundinternet.com.
15-Aug-2017	N/A	Email from Registrar (gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.
16-Aug-2017	16-Aug-2017	ICANN sent follow-up notice via email to gozde.demirkol@turkticaret.net and info@groundinternet.com.
16-Aug-2017	N/A	Emails from Registrar (<u>info@groundinternet.com</u>) insufficient to demonstrate compliance.
16-Aug-2017	23-Aug-2017	ICANN sent follow-up notices via email to gozde.demirkol@turkticaret.net and info@groundinternet.com and provided an extension.
17-Aug-2017	N/A	Emails from Registrar (gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.
17-Aug-2017	23-Aug-2017	ICANN sent follow-up notice via email to gozde.demirkol@turkticaret.net and info@groundinternet.com.
18-Aug-2017	23-Aug-2017	ICANN sent follow-up notice via email to gozde.demirkol@turkticaret.net and info@groundinternet.com.
23-Aug-2017	N/A	Email from Registrar (gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.
23-Aug-2017	23-Aug-2017	ICANN sent follow-up notice via email to gozde.demirkol@turkticaret.net and info@groundinternet.com.
24-Aug-2017	N/A	Emails from Registrar (info@groundinternet.com and gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.
24-Aug-2017	25-Aug-2017	ICANN sent follow-up notices via email to gozde.demirkol@turkticaret.net and info@groundinternet.com and provided a final extension.
25-Aug-2017	N/A	Email from Registrar (gozde.demirkol@turkticaret.net) insufficient to demonstrate compliance.



Date of Notice	Deadline for Response	Details
25-Aug-2017	25-Aug-2017	ICANN sent follow-up notice via email to gozde.demirkol@turkticaret.net and info@groundinternet.com. No response received from Registrar.
25-Aug-2017	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.