



22 March 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](mailto:paul@gkg.net)  
Fax: +1 979 314 7130

Dear Paul Marvin,

Please be advised that as of 22 March 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 clearly display on its 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").

Additional Concerns

Based on information received by ICANN during the processing of this matter, it is unclear whether GKG.NET's contact information with ICANN is up to date.

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

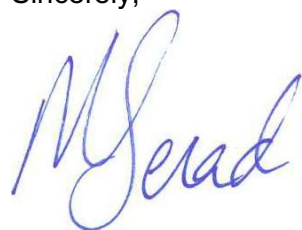
1. Clearly display renewal fees and post-expiration renewal fees (if different) on GKG.NET's website and provide a link to the renewal fees and post-expiration renewal fees (if different) in GKG.NET's registration agreement;
2. Ensure GKG.NET's contact information with ICANN is up to date;

3. Provide ICANN with the corrective and preventative action(s) that GKG.NET will take, with implementation date(s), to ensure the following:
  - a. timely payment of fees to ICANN; and
  - b. timely and complete response to ICANN Contractual Compliance matters; and
4. Pay all past due accreditation fees.

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

### Failure to clearly display renewal fees and post-expiration renewal fees (if different) on registrar's website and in registration agreement

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. GKG.NET's failure to provide a link in its registration agreement or clearly display on its website its renewal fees and post-expiration renewal fees (if different) is a breach of Section 4.1 of the ERRP.

### **Chronology:**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
27-Nov-2017 13-Dec-2017 8-Jan-2018 24-Jan-2018	N/A	ICANN sent detailed customer statements to GKG.NET regarding past due fees.
20-Feb-2018	27-Feb-2018	ICANN sent 1st compliance notice via email to <a href="mailto:paul@gkg.net">paul@gkg.net</a> . No response received from Registrar.
28-Feb-2018	7-Mar-2018	ICANN sent 2nd compliance notice via email to <a href="mailto:paul@gkg.net">paul@gkg.net</a> . No response received from Registrar.
8-Mar-2018	N/A	ICANN called Primary Contact at +1 979 710 5060. No answer and no ability to leave message. ICANN called Primary Contact at mobile number [NUMBER REDACTED] and left voicemail with complaint details.
12-Mar-2018	19-Mar-2018	ICANN sent 3rd compliance notice via email to <a href="mailto:paul@gkg.net">paul@gkg.net</a> . No response received from Registrar.
12-Mar-2018	N/A	ICANN sent 3rd compliance notice via fax to +1 979 314 7130. Fax successful.
13-Mar-2018	N/A	ICANN called Primary Contact at +1 979 710 5060 and left voicemail with complaint details. ICANN called Primary Contact at mobile number [NUMBER REDACTED] and left voicemail with complaint details.
21-Mar-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

Date of Notice	Deadline for Response	Details
22-Mar-2018	N/A	To date, the Registrar has not made full payment or responded to ICANN with the requested information and the issue remains unresolved.