



4 April 2018

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Christian Mueller
Cronon AG (IANA #141)
Pascalstrasse 10
Berlin 10587
Germany

Email: registrar@cronon.net
Fax: +49 30 39802 222

Dear Christian Mueller,

Please be advised that as of 4 April 2018, Cronon AG ("Cronon") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 26 September 2013 ("RAA"). This breach results from:

1. Cronon's failure to timely respond to ICANN's Contractual Compliance Audit Program ("Audit") notices, specifically:
 - a. Failure to provide documents and information, as required by Section 3.15 of the RAA; and
 - b. Failure to maintain and make available to ICANN registration data and records available upon request by ICANN, as required by Sections 3.4.2 and 3.4.3 of the RAA.

Please refer to the attachment for details regarding this breach.

In addition, Cronon has been deemed noncompliant in the following areas:

1. Cronon'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") and the Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement (RAA) regarding applicable Registration Data Directory Service (Whois) Specifications ("Clarifications"), and the Additional Whois Information Policy ("AWIP");
2. Cronon's failure to clearly display on Cronon's website, and include a link in its registration agreement to, its renewal fees and redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP");

3. Failure to provide on Cronon’s website and in its registration agreement, a description of the methods used to deliver pre- and post-expiration notifications, as required by Section 4.2 of the Expired Registration Recovery Policy (“ERRP”);
4. Failure to publish the full name and position of all officers of the registrar on Cronon’s website, as required by Section 3.17 of the RAA and Section 17 of the Registrar Information Specification (“RIS”) of the RAA; and
5. Failure to publish Cronon’s ultimate parent entity on Cronon’s website, as required by Section 3.17 and Section 22 of the RIS of the RAA.

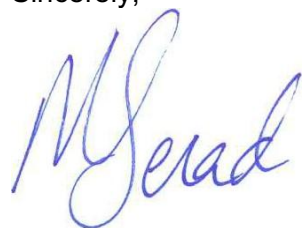
ICANN requests that Cronon cure these breaches by 25 April 2018, 21 days from the date of this letter, by taking the following actions:

1. Complete the Audit Remediation Phase by:
 - a. Uploading the outstanding documents identified in the audit report per previous audit instruction; or
 - b. Provide the outstanding documents identified in the audit report by email to complianceaudit@icann.org;
2. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification, Clarifications, and AWIP;
3. Clearly display renewal fees, post-expiration renewal fees (if different) and redemption/restore fees on Cronon’s website and provide a link to the renewal fees, post-expiration renewal fees (if different) and redemption/restore fees in Cronon’s registration agreement;
4. Provide a description of the methods used to deliver pre- and post-expiration notifications on Cronon’s website, and include a description of its notification methods or a link to the applicable page(s) on its website where this information is available in Cronon’s registration agreements;
5. Publish on Cronon’s website the full name and position of all officers of Cronon;
6. Publish Cronon’s ultimate parent entity on Cronon’s website; and
7. Provide ICANN with the corrective and preventative action(s) that Cronon will take, with implementation date(s), to ensure timely and complete response to ICANN Contractual Compliance matters.

If Cronon fails to timely cure the breaches and provide the information requested by 25 April 2018, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at owen.smigelski@icann.org.

Sincerely,



Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to provide documents and information for audit

Section 3.15 of the RAA requires Cronon, as part of any reasonable contractual compliance audit, to timely provide the documents and information known by Cronon necessary to demonstrate compliance with the terms of the RAA. As detailed in the chronology below, ICANN sent Cronon multiple notices regarding the requirements of ICANN's Audit Program. Cronon's failure to respond and provide the requested documents and information in response to the audit is a breach of Section 3.15 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 registered name holder (RNH) and registration data, and to make those records available to ICANN upon reasonable notice. Cronon's failure to provide the requested registration records and data related to the audit notices detailed in the chronology below is a breach of Sections 3.4.2 and 3.4.3 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. Additional specifications to the format of Whois query responses are contained in the Clarifications and the AWIP. Section 4.1 of the RAA requires registrars to comply with and implement all Consensus Policies, including the AWIP. Cronon's failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA, the Clarifications and AWIP.

Failure to clearly display renewal fees, post-expiration renewal fees (if different) and redemption/restore fees 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. Cronon's failure to provide a link in its registration agreement or clearly display these fees on its website is a breach of Section 4.1 of the ERRP.

Failure to describe the methods used to deliver pre- and post-expiration notifications

Section 4.2 of the ERRP requires registrars to describe on their websites (if used), and include in their registration agreements a description of its notification methods or a link to the applicable page(s) on their websites where this information is available, the methods used to

deliver pre- and post-expiration notifications for renewal of domain registrations. Cronon's failure to describe these notifications on its website and in its registration agreement is a breach of Section 4.2 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. Cronon'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 registrar's ultimate parent entity 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. Cronon's failure to publish its ultimate parent entity on Cronon's website is a breach of Section 3.17 of the RAA and Section 22 of the RIS.

Chronology:

Date of Notice	Deadline for Response	Details
7-Feb-2018	28-Feb-2018	ICANN sent 1st compliance notice via email to registrar@cronon.net .
28-Feb-2018	N/A	Email from Registrar (dschiemann@cronon.net) insufficient to demonstrate compliance.
28-Feb-2018	N/A	ICANN sent a follow-up notice via email to dschiemann@cronon.net and a copy to registrar@cronon.net to clarify Compliance process.
1-Mar-2018	8-Mar-2018	ICANN sent 2nd compliance notice via email to registrar@cronon.net . No response received from Registrar.
5-Mar-2018	N/A	ICANN called Primary Contact at +49 30 39802 0. Unable to reach Registrar.
13-Mar-2018	19-Mar-2018	ICANN sent 3rd compliance notice via email to registrar@cronon.net .
13-Mar-2018	N/A	ICANN sent 3rd compliance notice via fax to +49 30 39802 222. Fax successful.
14-Mar-2018	31-Mar-2018	ICANN sent follow-up compliance notice granting an extension via email to cmueller@cronon.net and dschiemann@cronon.net .
29-Mar-2018	N/A	ICANN called Primary Contact at +49 30 39802 0. Provided Registrar Representative with complaint details.
29-Mar-2018	31-Mar-2018	ICANN sent follow-up compliance notice via email to cmueller@cronon.net and dschiemann@cronon.net .

Date of Notice	Deadline for Response	Details
29-Mar-2018	N/A	Email from Registrar (cmueller@cronon.net) insufficient to demonstrate compliance.
29-Mar-2018	N/A	Email from Registrar (dschiemann@cronon.net) insufficient to demonstrate compliance.
30-Mar-2018	31-Mar-2018	ICANN sent follow-up compliance notice via email to cmueller@cronon.net , dschiemann@cronon.net and msattler@cronon.net .
2-Apr-2018	N/A	Email from Registrar (dschiemann@cronon.net) insufficient to demonstrate compliance.
3-Apr-2018	N/A	Email from Registrar (dschiemann@cronon.net) insufficient to demonstrate compliance.
3-Apr-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
4-Apr-2018	N/A	To date, the Registrar has not responded to ICANN with the requested information and the issue remains unresolved.