



The Internet Corporation for Assigned Names and Numbers

13 February 2017

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Michael Orza
Webair Internet Development, Inc. (IANA #1326)
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United States

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RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Dear Michael Orza,

Please be advised that as of 13 February 2017, Webair Internet Development, Inc. (“Webair Internet Development”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 28 August 2016 (“RAA”). This breach results from:

1. Webair Internet Development’s failure to take reasonable steps to investigate and correct claimed Whois inaccuracies regarding the domain name <rifflinks.com>, as required by Section 3.7.8 of the RAA;
2. Webair Internet Development’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 <rifflinks.com>, as required by Sections 3.4.2 and 3.4.3 of the RAA; and
3. Webair Internet Development’s failure to validate and verify Whois contact information, as required by Sections 1, 2 and 4 of the Whois Accuracy Program Specification (“WAPS”) of the RAA.

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Please refer to the attachment for details regarding these breaches.

In addition, Webair Internet Development has been deemed noncompliant in the following areas:

1. Webair Internet Development'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");
2. Webair Internet Development's failure to publish an email address to receive abuse reports on the home page of Webair Internet Development's website, as required by Section 3.18.1 of the RAA;
3. Webair Internet Development's failure to publish on its website a description of Webair Internet Development's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;
4. Webair Internet Development's failure to provide a description on Webair Internet Development's website, and in its registration agreement, of the methods used to deliver pre- and post-expiration notifications, as required by Section 4.2 of the Expired Registration Recovery Policy ("ERRP"); and
5. Webair Internet Development's failure to display the correct ICANN logo on Webair Internet Development's website, as required by the Logo License Specification of the RAA.

Additional Concerns

ICANN received a rejection notice from one of the email addresses listed for Webair Internet Development's Primary Contact in RADAR.

ICANN requests that Webair Internet Development cure these breaches by 6 March 2017, 21 days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Webair Internet Development took reasonable steps to investigate and, where applicable, correct the Whois inaccuracy concerning the domain name <rifflinks.com>. This includes: (a) copies of Webair Internet Development'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 Webair Internet Development 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 and the Clarifications;
3. Publish an email address to receive abuse reports on the home page of Webair Internet Development's website;
4. Publish a description of Webair Internet Development's procedures for the receipt, handling and tracking of abuse reports on Webair Internet Development's website;
5. Provide a description of the methods used to deliver pre- and post-expiration notifications on Webair Internet Development'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 Webair Internet Development's registration agreement;
6. Display the correct ICANN logo on Webair Internet Development's website in accordance with the Logo License Specification of the RAA, or remove the ICANN logo from Webair Internet Development's website;
7. Provide ICANN with the step(s) Webair Internet Development will take, including implementation date(s), to ensure Webair Internet Development's contacts with ICANN are up to date; and
8. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure that Webair Internet Development will timely respond to ICANN compliance matters.

If Webair Internet Development fails to timely cure the breaches and provide the information requested by 6 March 2017, ICANN may commence the RAA termination process.



Michael Orza
Webair Internet Development, Inc.

Page 4 of 7

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". The signature is fluid and cursive, with the first letter "M" being particularly large and stylized.

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. Webair Internet Development's failure to provide documentation demonstrating the reasonable steps it took to investigate and correct the alleged Whois inaccuracy for the domain name <rifflinks.com> 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. Webair Internet Development's failure to provide the requested registration records and data related to the domain name <rifflinks.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.



Webair Internet Development's failure to provide documents and information demonstrating validation and verification of the Whois data for the domain name <rifflinks.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. Additional specifications to the format of Whois query responses are contained in the Clarifications and the AWIP. Webair Internet Development's failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA and the Clarifications.

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. Webair Internet Development'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. Webair Internet Development'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 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. Webair Internet Development's failure to describe the methods of these notifications on its website and in its registration agreement is a breach of Section 4.2 of the ERRP.

Failure to display correct ICANN-Accredited Registrar logo

The Logo License Specification of the RAA requires registrars, if displaying the ICANN-Accredited Registrar logo, to use the logo displayed in the specification. Webair Internet Development's use of a



modified version of the ICANN-Accredited Registrar logo is a breach of the Logo License Specification of the RAA.

Chronology:

Date of Notice	Deadline for Response	Details
16-Dec-2016	16-Jan-2017	ICANN sent 1st compliance notice via email to mike@webair.com . No response received from Registrar.
18-Jan-2017	25-Jan-2017	ICANN sent 2nd compliance notice via email to mike@webair.com . No response received from Registrar.
24-Jan-2017	N/A	ICANN called Primary Contact at +1 516 938 4100 and provided Registrar representative with complaint details.
26-Jan-2017	2-Feb-2017	ICANN sent 3rd compliance notice via email to mike@webair.com , christy@webair.com , michele@webair.com and sagi.brody@webair.com . No response received from Registrar.
26-Jan-2017	N/A	ICANN sent 3rd compliance notice via fax to +1 516 938 5100. Fax successful.
31-Jan-2017	N/A	ICANN called Primary Contact at +1 516 938 4100 and provided Registrar representative with complaint details.
31-Jan-2017	2-Feb-2017	ICANN re-sent 3rd compliance notice via email to michael.ohayon@webair.com and justin.moran@webair.com . No response received from Registrar.
10-Feb-2017	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
13-Feb-2017	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.