

5 June 2019

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

**RE: NOTICE OF SUSPENSION OF REGISTRAR'S ABILITY TO CREATE NEW REGISTERED NAMES OR INITIATE INBOUND TRANSFERS OF REGISTERED NAMES**

Jasjit Sawhney  
Net 4 India Limited (IANA #1007)  
D-25, Sector-3  
Noida UP-201301  
India

Email: [jasjit.s@net4.in](mailto:jasjit.s@net4.in) and [jasjit.s@net4.com](mailto:jasjit.s@net4.com)  
Fax: +91 120 4323 520

**Update 20 June 2019:** ICANN is modifying this notice based on receipt of information regarding the insolvency proceedings related to Net 4 India Limited. The commencement of the suspension period noted below is postponed until further notice and the due date for providing ICANN with the requested items below is adjusted to 4 September 2019, to coincide with the expected completion date of the insolvency proceedings. Net 4 India Limited, or its designated representative, are required to provide ICANN with monthly updates, starting on 18 July 2019, regarding the progress and status of the insolvency proceedings. Failure of the registrar to demonstrate compliance and provide the items requested in this notice by 4 September 2019 may result in commencement of the suspension period or the termination of Net 4 India Limited's Registrar Accreditation Agreement with ICANN.

Dear Jasjit Sawhney:

This notice is sent to Net 4 India Limited ("Net 4 India") further to its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2014 ("RAA").

ICANN has found that insolvency proceedings were instituted against Net 4 India and not dismissed within thirty (30) days of their commencement. Accordingly, ICANN has suspended Net 4 India's ability to create new Registered Names or initiate inbound transfers of Registered Names for 90 days pursuant to Section 5.7 of the RAA in relation to 5.5.8 (v) of the RAA.

The suspension is effective 21 June 2019 at 00:00 UTC and will conclude on 18 September 2019 at 00:00 UTC, or longer if Net 4 India has not demonstrated compliance on or before 28 August 2019.

Consistent with Section 5.7 of the RAA, during the suspension period, Net 4 India must not:

1. Create new Registered Names for any generic top-level domain (“gTLD”); or
2. Initiate or accept inbound transfers of Registered Names for any gTLD.

To demonstrate compliance, Net 4 India must timely cure all breaches identified in this notice of suspension by:

1. Providing evidence that any bankruptcy, insolvency, reorganization or other laws relating to the relief of debtors proceedings instituted against Net 4 India have been dismissed.
2. Providing corrective and preventative action(s), including implementation date(s), to ensure Net 4 India will:
  - a. comply with the notification requirements in Section 3.20 of the RAA pertaining to the commencement of any of the proceedings referenced in Section 5.5.8 of the RAA;
  - b. timely respond to ICANN compliance matters; and
  - c. timely make payment of its ICANN fees.
3. Paying all past and currently due ICANN accreditation fees.

Failure to demonstrate compliance by 28 August 2019 may result in RAA termination and an extension to Net 4 India’s suspension pending final termination.

### **Notice on Net 4 India’s Website**

During the suspension period, Net 4 India must prominently display the following on its website on all pages where Registrar Services, as defined by the RAA, are offered:

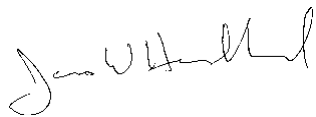
**No new gTLD registrations or inbound transfers will be accepted from 21 June 2019 through 18 September 2019.**

**This notice must also include a link to the notice of suspension from ICANN.**

Please be advised that Net 4 India may be subject to escalated compliance action (including RAA termination) if ICANN receives additional information, either through complaints or its own monitoring, demonstrating that Net 4 India continues to violate the RAA or Consensus Policies, including failure to timely pay accreditation fees, during or after the suspension period ends.

If you have questions or require assistance, please contact Leticia Castillo at [leticia.castillo@icann.org](mailto:leticia.castillo@icann.org).

Sincerely,



Jamie Hedlund  
Senior Vice President, Contractual Compliance and Consumer Safeguards  
Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary

#### Chronology:

Date of Notice	Deadline for Response	Details
23-Apr-2019	30-Apr-2019	ICANN sent Escalated compliance notice via email to <a href="mailto:jasjit.s@net4.in">jasjit.s@net4.in</a> . No response received from Registrar.
23-Apr-2019	N/A	ICANN sent Escalated compliance notice via fax to +91 120 4323 520. Fax unsuccessful.
24-Apr-2019	N/A	ICANN called Primary Contact at +91 120 4323 500. ICANN called Registrar Representative at +91 11 45980000. No answer and no ability to leave a voicemail.
25-Apr-2019	N/A	ICANN called Registrar Representative at mobile number [NUMBER REDACTED] and provided Registrar Representative with compliance notice details.
25-Apr-2019	N/A	ICANN re-forwarded Escalated compliance notice to email addresses <a href="mailto:jasjit.s@net4.in">jasjit.s@net4.in</a> , <a href="mailto:jasjit.s@net4.com">jasjit.s@net4.com</a> and <a href="mailto:vineet.b@net4.com">vineet.b@net4.com</a> .
30-Apr-2019	N/A	Email from registrar ( <a href="mailto:vineet.b@net4.com">vineet.b@net4.com</a> ) insufficient to demonstrate compliance.
3-May-2019	10-May-2019	ICANN sent follow-up compliance notice via email to <a href="mailto:jasjit.s@net4.in">jasjit.s@net4.in</a> , <a href="mailto:vineet.b@net4.com">vineet.b@net4.com</a> , <a href="mailto:jasjit.s@net4.com">jasjit.s@net4.com</a> and [EMAIL REDACTED].
3-May-2019	N/A	ICANN called Registrar Representative at mobile number [NUMBER REDACTED] and provided Registrar Representative with compliance notice details.
8-May-2019	N/A	Email from Resolution Professional appointed by competent national court insufficient to demonstrate that the Registrar is in compliance.

Date of Notice	Deadline for Response	Details
5-Jun-2019	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
5-Jun-2019	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.