



10 December 2020

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj
Net 4 India Limited (IANA #1007)
D-25, Sector 3
Noida, Uttar Pradesh, 201301
India

308, Pearls Business Park
Netaji Subhash Place, Pitampura
Delhi, 110034
India

Email: bajaj.vikram@gmail.com

Dear Vikram Bajaj:

Please be advised that as of 10 December 2020, Net 4 India Limited ("Net 4 India") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA"). This breach results from:

1. Net 4 India's failure to provide an interactive webpage and a port 43 Whois service, also known as Registration Data Directory Service ("RDDS"), providing free public query-based access to up-to-date data concerning all active registered names sponsored by Net 4 India for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA.
2. Net 4 India's failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

In addition, Net 4 India has been deemed noncompliant in the following area:

1. Net 4 India's failure to escrow gTLD registration data, as required by Section 3.6 of the RAA.
2. Net 4 India'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 these breaches.

By not providing the records and information requested in the compliance cases detailed in the chronologies below, each case comprising a different number of affected domain names, Net 4 India has failed to:

1. Demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provides the Registered Name Holder (“RNH”) with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5) calendar days of the RNH's initial request if the registrar does not provide facilities for the RNH to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In addition, with respect to the domain names deesan.com, arhydraulicfittings.com and slkbima.com Net 4 India has failed to provide:
 - a. An explanation addressing the allegations that the domain names were transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider (“Openprovider”), without the knowledge or authorization of the RNHs; and
 - b. Records to demonstrate compliance with Section I.A.3 of the Transfer Policy. Specifically, that through the mandatory Form of Authorization (“FOA”), Net 4 India confirmed the RNHs’ intent to transfer each domain name when the relevant notice of pending transfer was received from the registry operator.

2. Demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy (“ERRP”), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration (“RAE”) must be permitted by the registrar to renew the expired registration. In its responses to the compliance cases, Net 4 India provided the ‘Registry Expiry Date’ displayed through the relevant Registry’s RDDS, also known as Whois service, as evidence that the domain names had been renewed. However, on repeated occasions, ICANN explained to Net 4 India that the ‘Registry Expiry Date’ is not indicative of an explicit extension of the registration by your registrar and highlighted the ‘Registrar Registration Expiration Date’ which, while your registrar’s RDDS was operative, indicated the domain name registrations remained expired. ICANN then requested specific evidence of the domain names registration renewals completed by your registrar, Net 4 India did not respond to this request in any of the cases below.

Additional Concerns

Over the past few months, the number of complaints ICANN Contractual Compliance has received from RNHs, and authorized representatives, asserting that Net 4 India is exhibiting a pattern of non-response to domain transfer and renewal requests has steadily increased. While addressing the relevant compliance cases, Net 4 India’s responses to ICANN Contractual Compliance have also regularly been untimely and incomplete.

Further, due to unavailability of a registrar Whois/RDDS output by Net 4 India, ICANN is unable to currently confirm Net 4 India's compliance with Whois formatting requirements.

ICANN requests that Net 4 India cure these breaches by 31 December 2020, 21 days from the date of this letter, by taking the following actions:


1. 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 Net 4 India for each TLD in which it is accredited.
2. To demonstrate compliance with the Transfer Policy:
 - a. For each of the following domain names in Appendix A, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - ii. Evidence that each of the RNHs has been provided with the corresponding AuthInfo code and, where applicable, the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
 - b. For the domain names deesan.com, arhydraulicfittings.com and slkbima.com provide:
 - i. An explanation concerning the circumstances under which the domain names were transferred from Net 4 India to Openprovider.
 - ii. A copy of the FOA Net 4 India sent to the RNHs prior to the domain names' transfer from Net 4 India to Openprovider.
 - iii. Explanation and evidence regarding the method by which the AuthInfo codes were provided to the RNHs, and the dates they were provided.
 - c. For the domain names in Appendix B, provide:
 - i. Confirmation whether Net 4 India Limited has received from the relevant RNHs/RAEs AuthInfo code requests and/or requests to remove the "ClientTransferProhibited" status; and, if confirmed, please provide:
 - ii. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - iii. Evidence that each of the RNHs has been provided with the corresponding AuthInfo code and, where applicable, the "ClientTransferProhibited" status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
3. To demonstrate compliance with the ERRP:

- a. For each of the following domain names in Appendix B, provide:
 - i. Evidence that the domain names have been renewed (such as a copy of your Registrar's RDDS/Whois output showing the updated "Registrar Registration Expiration Date", or system logs showing a successful renew command sent to the registry operator).
 - ii. Copies of any communications between your registrar and RNHs/RAEs, or authorized representatives, relating to renewal requests.
4. Provide ICANN the corrective and preventative action(s) that Net 4 India will take, with implementation date(s), to address:
 - a. Its pattern of incomplete and untimely responses to ICANN Contractual Compliance matters in general.
 - b. Its pattern of untimely responses to RNHs' requests seeking assistance from your registrar prior to, and without the need of, submitting a complaint to ICANN Contractual Compliance.
5. Deposit gTLD registration data on a weekly basis to an approved escrow agent and ensure that the deposits meet the required specifications.
6. Pay all past and currently due accreditation fees.

If Net 4 India fails to timely cure the breaches and provide the information requested by 31 December 2020, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at 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

ATTACHMENT

Failure to provide an interactive webpage and port 43 Whois service

Section 3.3.1 of the RAA requires registrars 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 the registrar. Net 4 India's failure to provide these RDDS/Whois services is a breach of Section 3.3.1 of the RAA.

Failure to make registered name holder and registration 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. Net 4 India's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

Failure to escrow gTLD registration data

Section 3.6 of the RAA requires registrars to submit an electronic copy of the data described in Sections 3.4.1.2 through 3.4.1.5 of the RAA to ICANN or, at the registrar's expense, to a reputable escrow agent mutually approved by the registrar and ICANN. Registrars shall submit the data on a schedule, under the terms, and in a format specified by ICANN. Net 4 India's weekly deposits due on 26 November 2020 and 3 December 2020 were not made which is a breach of Section 3.6 of the RAA.

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. Net 4 India owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

APPENDIX A

terraquests.com
saralindia.com
mysetu.org
ai4i4.com
ai4machines.com
al4Marine.com
al4Nav.com
ai4processes.com
aicompetent.com
aifortell.com
aistcw.com
amarjeetrewari.com
amarjeetrewari.net
amarjitrewari.com
amarjitrewari.net

andthentherewaslight.com
appliedresearchinstitute.com
appliedresearchinstitute.net
appliedresearchinternational.com
appliedresearchinternational.net
ariebiz.com
ariedu.com
arieducation.com
arimach.com
ariprocess.com
arisimulation.com
arisimulation.net
ariworld.com
ariworld.net
cockpitguru.com
dnasimulation.com
educationdna.com
eneemrana.com
firstillusion.com
guravrewari.com
guravrewari.net
greenneemrana.com
guru4fun.com
guru4games.com
gurucockpit.com
gurucrane.com
gurudevice.com
gurudollar.com
gurudollars.com
gurudrive.com
guruearn.com
gurufastfood.com
gurufather.com
guruforfun.com
guruforgames.com
gurumachine.com
gurumachines.com
gurumove.com
gurunewspaper.com
gurunuts.com
guruoptics.com
gurupaint.com
gururide.com
gurusail.com
gurusgod.com
gurushoot.com

gurusimulations.com
gurusimulator.com
gurustay.com
gurustrain.com
guruvr.com
guruwings.com
headsandhunters.com
in2simulation.com
in2simulation.net
indianseafarer.com
insidesimulation.com
insidesimulation.net
intosimulation.com
intosimulation.net
intusimulation.net
intwosimulation.com
intwosimulation.net
irisdrilling.com
irisdriving.com
irismarine.com
irisoffshore.com
japanneemrana.com
marinegurukul.com
marinegurukul.net
maritimegurukul.com
mydreamserver.net
myneemrana.com
naomirewari.com
naomirewari.net
natasharewari.com
natasharewari.net
navigationguru.com
navyguru.com
neeemranasohos.com
neemrana1.com
neemranaboulevard.com
neemranacentral.com
neemranacentralpark.com
neemranacountry.com
neemranacountryresorts.com
neemranacountryside.com
neemranaeducation.com
neemranaespacia.com
neemranaestates.com

neemranaexotica.com
neemranafortview.com
neemranagardens.com
neemranagardenvillas.com
neemranagrand.com
neemranaheights.com
neemranahomes.com
neemranahub.com
neemranainstitute.com
neemranajapan.com
neemranaparadise.com
neemranarealestate.com
neemranaregal.com
neemranaresort.com
neemranaresorts.com
neemranaroyale.com
neemranasoho.com
neemranasplendour.com
neemranatimes.com
neemranatowers.com
neemranauniversity.com
neemranavillas.com
neemranawoods.com
nextoceanstrategy.com
oceanadmin.com
oceanadministrator.com
oceanadministrator.net
oceandatabase.com
oceandatabase.net
oceandatabases.com
oceandatabases.net
oceangov.com
oceangov.net
oceangovern.com
oceangovern.net
oceangovernance.com
oceangovernance.net
oceanguru.com
oceanguru.net
oceangurukul.com
oceannext.com
oceansdatabase.com
oceansdatabase.net
oneneemrana.com
ourdreamserver.com
rewarifamily.com

rewarifamily.net
sagarmala.com
sagarmala.net
shippingdna.com
shravanrewari.com
shravanrewari.net
shyamsundersinghrewari.com
shyamsundersinghrewari.net
simulationdna.com
snbone.com
thednaofeducation.com
thednaofsimulation.com
tronicsAi.com
virtualcrane.com
virtualcrane.net
virtualneemrana.com
vrneemrana.com
weareinneemrana.com
weareneemrana.com

APPENDIX B

bhombu.com
hyglassindia.com
medkem.com
keralacanoetourism.com
prasannalakshmiauditorium.com
taxikerala.org
gajanand.com
gajanandfoods.com
dmmetals.com
customercarehelpline.com

CHRONOLOGIES

Chronology (00983396):

Date of Notice	Deadline for Response	Details
27-Oct-2020	3-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
1-Nov-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
1-Nov-2020	3-Nov-2020	ICANN sent follow-up compliance notice via email to icannresolutions@net4.com and bajaj.vikram@gmail.com . No response received from Registrar.
4-Nov-2020	11-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00986617):

Date of Notice	Deadline for Response	Details
14-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
19-Nov-2020	26-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
8-Dec-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
8-Dec-2020	8-Dec-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00986008):

Date of Notice	Deadline for Response	Details
11-Nov-2020	17-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
23-Nov-2020	30-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
2-Dec-2020	8-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00979893):

Date of Notice	Deadline for Response	Details
9-Oct-2020	16-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.

Date of Notice	Deadline for Response	Details
20-Oct-2020	27-Oct-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
14-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00977571):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
15-Oct-2020	22-Oct-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
30-Nov-2020	7-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
3-Dec-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and left voicemail with complaint details. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00971966):

Date of Notice	Deadline for Response	Details
31-Aug-2020	7-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com and shikha.90712@gmail.com
2-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
3-Sep-2020	N/A	ICANN re-sent 1st compliance notice via email to bajaj.vikram@gmail.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
3-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) insufficient to demonstrate compliance.
17-Sep-2020	24-Sep-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00972641):

Date of Notice	Deadline for Response	Details
3-Sep-2020	10-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
4-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Sep-2020	1-Oct-2020	ICANN sent 2 nd compliance notice via email to bajaj.vikram@gmail.com , [EMAIL REDACTED], shikha.90712@gmail.com , jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
20-Oct-2020	27-Oct-2020	ICANN sent a follow-up compliance notice to via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com , pankaj.s@net4.com and jasjit.s@net4.com . No response received from Registrar.

Date of Notice	Deadline for Response	Details
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00976977):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to icannresolutions@net4.com , bajaj.vikram@gmail.com , shikha.90712@gmail.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
30-Sep-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com , [EMAIL REDACTED], shikha.90712@gmail.com and icannresolutions@net4.com . No response received from Registrar.
18-Oct-2020	26-Oct-2020	ICANN sent 2 nd compliance notice to via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , icannresolutions@net4.com and [EMAIL REDACTED]. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00978716):

Date of Notice	Deadline for Response	Details
5-Oct-2020	12-Oct-2020	ICANN sent 1st compliance notice via email to icannresolutions@net4.com , bajaj.vikram@gmail.com , shikha.90712@gmail.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
19-Oct-2020	26-Oct-2020	ICANN sent 2nd compliance notice via email to icannresolutions@net4.com , bajaj.vikram@gmail.com , shikha.90712@gmail.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00975973):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com .
22-Sep-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
5-Oct-2020	12-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00976043):

Date of Notice	Deadline for Response	Details
21-Sep-2020	28-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED] and icannresolutions@net4.com .
22-Sep-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
6-Oct-2020	13-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from Registrar.
26-Oct-2020	2-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED] and icannresolutions@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00977573):

Date of Notice	Deadline for Response	Details
28-Sep-2020	5-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from the Registrar.
6-Oct-2020	13-Oct-2020	ICANN sent 2 nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from the Registrar.
12-Oct-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
14-Oct-2020	N/A	Email indicating the compliance case had been closed was mistakenly sent to bajaj.vikram@gmail.com
29-Oct-2020	5-Nov-2020	ICANN sent follow-up compliance notice to bajaj.vikram@gmail.com explaining the error and requesting a full response to the compliance case.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED] and icannresolutions@net4.com . No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (MDZ-368-16882):

Date of Notice	Deadline for Response	Details
25-Aug-2020	1-Sep-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com . No response received from Registrar. No response received from the Registrar.
2-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from the Registrar.
4-Sep-2020	4-Sep-2020	ICANN re-sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com and [EMAIL REDACTED]. No response received from the Registrar.
4-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
21-Sep-2020	28-Sep-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED] and icannresolutions@net4.com . No response received from the Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED] and icannresolutions@net4.com . No response received from the Registrar.
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.

Date of Notice	Deadline for Response	Details
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (NMC-663-14600):

Date of Notice	Deadline for Response	Details
19-Aug-2020	26-Aug-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com . No response received from Registrar.
28-Aug-2020	4-Sep-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com . No response received from Registrar.
2-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) outside of the compliance case requesting all compliance communications be also addressed to the email addresses [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
4-Sep-2020	4-Sep-2020	ICANN re-sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED].
4-Sep-2020	N/A	Email received from Registrar (bajaj.vikram@gmail.com) insufficient to demonstrate compliance.
18-Sep-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
22-Sep-2020	N/A	ICANN re-sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com with immediate response requested. No response received from Registrar.
10-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
13-Nov-2020	20-Nov-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , jasjit.s@net4.com , jasjit.s@net4india.com , [EMAIL REDACTED], icannresolutions@net4.com . No response received from the Registrar.

Date of Notice	Deadline for Response	Details
18-Nov-2020	N/A	ICANN called Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
9-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.



24 December 2020

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

Vikram Bajaj
Net 4 India Limited (IANA #1007)
308, Pearls Business Park
Netaji Subhash Place, Pitampura
Delhi, 110034
India

Email: bajaj.vikram@gmail.com

Dear Vikram Bajaj:

Please be advised that as of 24 December 2020, Net 4 India Limited ("Net 4 India") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 14 October 2019 ("RAA"). This breach results from:

1. Net 4 India's failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

Please refer to the attachment for details regarding this breach.

By not providing the records and information requested in the compliance cases detailed in the chronologies below Net 4 India has failed to:

1. Demonstrate compliance with Section I.A.5 of the Transfer Policy which mandates that, subject to ICANN specifications or policies and any applicable laws or regulations, the registrar provides the Registered Name Holder ("RNH") with the unique "AuthInfo" code and remove the "ClientTransferProhibited" within five (5) calendar days of the RNH's initial request if the registrar does not provide facilities for the RNH to generate and manage their own unique "AuthInfo" code and to remove the "ClientTransferProhibited" status. In addition, with respect to the domain name arion.asia Net 4 India has failed to provide:
 - a. An explanation addressing the allegations that the domain name was transferred from Net 4 India to Hosting Concepts B.V. d/b/a Registrar.eu, formerly known as Hosting Concepts B.V. d/b/a Openprovider ("Openprovider"), without the knowledge or authorization of the RNH; and

- b. Records to demonstrate compliance with Section I.A.3 of the Transfer Policy. Specifically, that through the mandatory Form of Authorization (“FOA”), Net 4 India confirmed the RNH’s intent to transfer the domain name when the relevant notice of pending transfer was received from the registry operator.
2. Demonstrate compliance with Section 2.2.5 of the Expired Registration Recovery Policy (“ERRP”), which mandates that beginning at the time of expiration and through the Domain Name System resolution interruption period described in ERRP Sections 2.2.2-.3, the Registrant at Expiration (“RAE”) must be permitted by the registrar to renew the expired registration. In the responses that were received in the compliance case, Net 4 India appeared to provide the ‘Registry Expiry Date’ displayed through the relevant Registry’s Registration Data Directory Service (“RDDS”), also known as Whois service, as evidence that the domain name had been renewed. However, ICANN explained to Net 4 India that the ‘Registry Expiry Date’ is not indicative of an explicit extension of the registration by your registrar and highlighted the ‘Registrar Registration Expiration Date’ which, while your registrar’s RDDS was operative, indicated the domain name registration remained expired. ICANN then requested specific evidence of the domain name registration renewal completed by your registrar, Net 4 India did not respond to this request.

Additional Concerns

Net 4 India Limited continues to exhibit the same pattern of conduct that led to the notice of breach issued against it by ICANN on 10 December 2020, which must be cured by 31 December 2020.

ICANN requests that Net 4 India cure all breaches in this notice by 14 January 2021, 21 days from the date of this letter, by taking the following actions:

1. To demonstrate compliance with the Transfer Policy:
 - a. For the domain name bafindia.com, provide:
 - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email.
 - ii. Evidence that the RNH has been provided with the AuthInfo code and the “ClientTransferProhibited” status has been removed in the terms prescribed by Section I.A.5 of the Transfer Policy.
 - iii. Copies of any communications between your registrar and the RNH, or authorized representative, relating to transfer requests.
 - b. For the domain name arion.asia, provide:
 - i. An explanation concerning the circumstances under which the domain name was transferred from Net 4 India to Openprovider.

- ii. A copy of the FOA Net 4 India sent to the RNH prior to the domain name's transfer from Net 4 India to Openprovider.
- iii. Explanation and evidence regarding the method by which the AuthInfo code was provided to the RNH, and the date(s) it was provided.
- iv. Copies of any communications between your registrar and the RNH, or authorized representative, that occurred between 1 September 2020 and the time the domain name was transferred to Openprovider, including, but not limited to, requests concerning modification of the Whois information, and an explanation of any steps Net 4 India took in response to these communications.

2. To demonstrate compliance with the ERRP:

a. For the domain names shubhlinegroup.com, provide:

- i. Evidence that the domain name has been renewed (such as a copy of your Registrar's RDDS/Whois output showing the updated "Registrar Registration Expiration Date", or system logs showing a successful renew command sent to the registry operator).

b. For the domain name aurisignum.com, provide:

- i. Evidence that the RAE has been permitted to renew the domain name registration.
- ii. Copies of any communications between your registrar and the RNH/RAE, or authorized representative, relating to renewal requests.

If Net 4 India fails to timely cure the breach and provide the information requested by 14 January 2021, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at 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

ATTACHMENT

Failure to make registered name holder and registration data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA require registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Net 4 India's failure to provide the requested registration records and data related to the domain names in the compliance notices detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

CHRONOLOGIES

Chronology (00984013):

Date of Notice	Deadline for Response	Details
30-Oct-2020	6-Nov-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com . No response received from Registrar.
13-Nov-2020	20-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00980845):

Date of Notice	Deadline for Response	Details
14-Oct-2020	21-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
21-Oct-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
19-Nov-2020	26-Nov-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
4-Dec-2020	11-Dec-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00977040):

Date of Notice	Deadline for Response	Details
25-Sep-2020	2-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com .
29-Sep-2020	N/A	Email received from Registrar (icannresolutions@net4.com) insufficient to demonstrate compliance.
21-Oct-2020	28-Oct-2020	ICANN sent follow-up compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.

Date of Notice	Deadline for Response	Details
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail. ICANN called Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
16-Dec-2020	23-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], jasjit.s@net4india.com and jasjit.s@net4.com . No response received from Registrar.
24-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Chronology (00976900):

Date of Notice	Deadline for Response	Details
24-Sep-2020	1-Oct-2020	ICANN sent 1st compliance notice via email to bajaj.vikram@gmail.com . No response received from Registrar.
10-Nov-2020	17-Nov-2020	ICANN sent 2nd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED] and jasjit.s@net4india.com . No response received from Registrar.

Date of Notice	Deadline for Response	Details
18-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
27-Nov-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and spoke with Registrar Representative. No ability to provide the Registrar with the complaint details.
3-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and left voicemail. ICANN called Primary Contact and Compliance Contact at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
10-Dec-2020	17-Dec-2020	ICANN sent 3rd compliance notice via email to bajaj.vikram@gmail.com , shikha.90712@gmail.com , pankaj.s@net4.com , icannresolutions@net4.com , [EMAIL REDACTED], and jasjit.s@net4india.com . No response received from Registrar.
15-Dec-2020	N/A	ICANN called Primary Contact and Compliance Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN called Primary Contact Compliance and Contact at +91 01145789408 and at [TELEPHONE REDACTED]. No ability to provide the Registrar with the complaint details or to leave a voicemail.
24-Dec-2020	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
24-Dec-2020	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

Annexure C

SCREENSHOT OF SEARCHES ON WHOIS PORTAL ON 21 JANUARY 2021

net4.com/net4app/asp/whois.aspx

ICANN Links Iron Mountain Con... Whois Lookup, Do... RADARView - ICA... Advisory: Clarifica... Registrar IDs/RDAP ComplianceNotice...

In the light of recent advisory and lock-down due to Covid19 pandemic our call centers are operating with minimal staff, so the call response will be delayed hope co-operate with us. Further Our Technical Email support is functional 24 * 7 kindly email us on corporatesupport@net4.in / renewals@net4.com. Our Payment Gateway is up and running smoothly

net4 +91-11-45980000 Login/Sign up ₹

DOMAINS HOSTING EMAIL EASYsite OFFICE 365 CLOUDSERVER SSL RI

Whois - Who owns this domain

centalla.com SEARCH

No Information Found

net4.com/net4app/asp/whois.aspx

ICANN Links Iron Mountain Con... Whois Lookup, Do... RADARView - ICA... Advisory: Clarifica... Registrar IDs/RDAP ComplianceNotice...

In the light of recent advisory and lock-down due to Covid19 pandemic our call centers are operating with minimal staff, so the call response will be delayed hope co-operate with us. Further Our Technical Email support is functional 24 * 7 kindly email us on corporatesupport@net4.in / renewals@net4.com. Our Payment Gateway is up and running smoothly

net4 +91-11-45980000 Login/Sign up ₹

DOMAINS HOSTING EMAIL EASYsite OFFICE 365 CLOUDSERVER SSL RESE

Whois - Who owns this domain

pjnetworks.com SEARCH

No Information Found

In the light of recent advisory and lock-down due to Covid19 pandemic our call centers are operating with minimal staff, so the call response will be delayed hope co-operate with us. Further Our Technical Email support is functional 24 * 7 kindly email us on corporatesupport@net4.in / renewals@net4.com
Our Payment Gateway is up and running smoothly



+91-11-45980000 Login/Sign up ₹

- DOMAINS
- HOSTING
- EMAIL
- EASySite
- OFFICE 365
- CLOUDSERVER
- SSL
- RESE

Whois - Who owns this domain

No Information Found

Annexure D

NET 4 INDIA'S BREACHES OF THE RAA WITH ICANN

Sl. No.	Breach by Corporate Debtor	Impact of breach	Remedial Measures (if any)
1.	BREACH OF SECTION 3.3.1 DUE TO FAILURE TO PROVIDE INTERACTIVE WEBPAGE AND A PORT 43 WHOIS SERVICE.		
	<p>Per Section 3.3.1 of the RAA, Net 4 must provide free, public query-based access to the latest data on all active website names / registered names that it sponsors. Net 4 is required to provide this through an interactive webpage and a port 43 Whois portal.</p> <p>A 'Whois' portal is one which answers the question "<i>Who is responsible for a domain name or an IP address?</i>". Whois data contains identifying and contact information which includes the name, address, email, phone number, and administrative and technical contacts of Registrants.</p> <p>Net 4 India has not provided accessibility to registration data for domains registered with Net 4 through its Whois service since October 2020.</p>	<p>By failing to cure this breach, Net 4 is preventing Registrants, internet users in general, law enforcement authorities, intellectual property owners, and cybersecurity researchers from accessing critical information regarding domain names managed by Net 4.</p> <p>Further, Net 4's failure to provide an interactive webpage and a port 43 Whois service has had an adverse impact on ICANN's ability to process hundreds of individual complaints made by Registrants. In order to process the complaints received, ICANN is required to access the relevant data. However, due to Net 4's breaches, it is unable to do so. Hence, the Corporate Debtor's breaches severely hampered ICANN's ability to discharge its functions (carried out in public interest).</p>	<p style="text-align: center;">None.</p> <p>ICANN conducted Whois searches of certain domain names registered with Net 4 India on 21 January 2021, using Net 4 India's web-based Whois service to find that it yields no results – only a notation that "No Information found."</p>
2.	BREACH OF SECTION 3.4.3 OF THE RAA DUE TO FAILURE TO DEMONSTRATE COMPLIANCE WITH SECTION I.A.5 OF THE TRANSFER POLICY		
	<p>Section 3.4.3 of the RAA requires Net 4 to make the relevant data (such as communications with Registrants regarding transfer or renewal requests) available to ICANN, upon request. This <i>inter alia</i> demonstrates compliance with the Transfer Policy and the Expired Registration Recovery Policy. Net 4 has failed to provide this data despite multiple requests by ICANN. Net 4 is in breach of the Transfer Policy and the Expired Registration Recovery Policy for the reasons set out below. It has failed to demonstrate compliance with these policies, thereby breaching Section 3.4.3 of the RAA.</p>		
a.	<i>Failure to demonstrate compliance with the Transfer Policy</i>		
	<p>Section I.A. 5 of the Transfer Policy prohibits Net 4 from setting the status of a website / domain name to 'Client Transfer Prohibited' unless the Customer requests that this be done. Further, Section I.A. 5 requires Net 4 to provide Registrants with the AuthoInfo Code, upon request. These requirements are necessary to enable Registrants to transfer their websites / domain names from one registry to another.</p>	<p>If a Customer wishes to transfer its domain name from Net 4 to a different registrar, it must obtain its unique 'AuthoInfo Code' from Net 4 and provide it to the new and preferred registrar. A transfer is not possible without the AuthInfo Code. Additionally, Net 4 must not maintain the status of the domain name as 'Client Transfer Prohibited'. As the name suggests, this status will lock the domain name and prevent Registrants from transferring to a new registrar if they wish to.</p>	<p style="text-align: center;">None - no evidence provided.</p>

Sl. No.	Breach by Corporate Debtor	Impact of breach	Remedial Measures (if any)
	<p>Here, Net 4 has not adhered to these requirements, i.e., it has not provided the AuthInfo Code to Registrants, despite repeated requests. It has also refused to change the status of Registrants' websites / domain names from 'Client Transfer Prohibited' to a status which permits transfers. This is a breach of Section I.A. 5 of the Transfer Policy.</p> <p>Further, Net 4 has transferred certain websites / domain names from Net 4 to Hosting Concepts B.V. d/b/a Registrar.eu, without the relevant Registrants' consent and has asserted that Net 4 India was acting as the reseller when the transfers occurred and as a reseller it "can choose to move their customers to other registrars."</p> <p>This is not correct and is in violation of the Transfer Policy. Failure to demonstrate compliance with the Transfer Policy is a breach of Section 3.4.3 of the RAA.</p>	<p>Net 4's breaches in this regard are preventing Registrants, many of whose online businesses and identities depend on their websites / domain names, from transferring their website / domain name from Net 4 to any other registry. Essentially, Net 4 is holding Registrants hostage and is forcing them to avail of its service. At the same time, Net 4 is not providing the services needed for Registrants to operate their domain names. ICANN has received more than 1000 complaints from Registrants in this regard, more than 600 remain unresolved.</p>	
b.	<i>Failure to demonstrate compliance with the Expired Registration Recovery Policy</i>		
	<p>Section 2.2.5 of the Expired Registration Recovery Policy mandates that Net 4 permit its Registrants to renew any expired registrations of their websites / domain names. Numerous Registrants have requested Net 4 for a renewal of their websites / domain names. However, Net 4 has failed to renew the expired registrations. It has also failed to demonstrate compliance with the Expired Registration Recovery Policy, thereby breaching Section 3.4.3 of the RAA.</p>	<p>A Customer may use a website / domain name for the period of time for which it is registered, which can be from one to ten years. In order to keep using the website / domain name and any of the services associated with it (like an email service) the Customer must be able to renew the domain name registration before it is expired and deleted. By not effectively permitting Registrants to renew domain name registrations, Net 4 is putting Registrants at risk of losing their websites / domain names upon which they may have built their businesses, non-profit institutions and/or educational websites. Needless to say, this is grave and irreparable harm caused to Registrants.</p> <p>ICANN receives complaints regarding unresolved renewal requests to Net 4, on a daily basis.</p>	<p>None</p> <p>Registration data for many domain names remains to be provided. Net 4 has not provided evidence that the domain names have been renewed.</p>
3.	BREACH OF SECTION 3.9 OF THE RAA DUE TO FAILURE TO PAY ACCREDITATION FEES		

Sl. No.	Breach by Corporate Debtor	Impact of breach	Remedial Measures (if any)
	<p>Section 3.9 requires Net 4 to pay accreditation fees to ICANN as a condition of accreditation. These fees consist of yearly fees (USD 4,000 per year) and variable fees, which are determined by the transaction type and volume of each registrar. Net 4 India, through the resolution professional Mr. Vikram Bajaj, has been provided customer statements and copies of pending invoices on several occasions.</p> <p>Net 4 India has either failed to pay or failed to timely pay every invoice from April 2019 to the present.</p>	<p>Failure to pay ICANN the fees due to it impedes ICANN's ability to function effectively. ICANN is a not-for-profit organization, operating in public benefit. It charges minimal fees in order to fund its operations, at cost.</p>	<p>Net 4 has paid some of the fees due to ICANN, albeit in a delayed fashion. However, as of 22 January 2021, Net 4 still owes US\$4,663.18 in past due fees and US\$1,000 in currently due fees. to ICANN.</p>
4.	BREACH OF SECTION 3.6 OF THE RAA DUE TO FAILURE TO ESCROW REGISTRATION DATA		
	<p>As per Section 3.6 of the RAA, Net 4 is required to submit certain registration data to an escrow agent in order to safeguard Registrants. Net 4 has is required to do so on a weekly basis and has not done so regularly. o Net 4 India failed to make the mandatory data deposits on 26 November 2020, 3 December 2020 and 10 December 2020 - thereby breaching Section 3.6.</p> <p>By storing registration data with a data escrow provider, it is possible to recover website /domain name registrations in the event of registry or registrar failure, accreditation termination, or non-renewal. In fact, data escrows are meant to be of assistance precisely in situations such as the present one, where Net 4 is failing to fulfil its obligations.</p>	<p>By failing to escrow the data as required, Net 4 has been putting Registrants at risk of permanently losing their website / domain name registrations with no chance of recovery.</p>	<p>Data escrow deposit due on 21 January 2021 has been made by Net 4 - to be verified.</p>

Annexure E

BRIEF ILLUSTRATIVE LIST OF THE COMPLAINTS MADE BY REGISTRANTS / CUSTOMERS, AND THEIR AUTHORIZED REPRESENTATIVES, TO ICANN EXPRESS CONCERNS REGARDING NET 4 INDIA.

The following information has been redacted from the quotes below: domain names that are not included in a public Notice of Breach, reporters' contact details, and payment amounts.

- *“I am having 10 domains in Net 4 India. Not response over mail, phone & ticket, Now I am getting problem to transfer to service provider. Need help.”*
- *“I am struggling to contact Net 4 India on phone and mails. No response from them and +91-11-45980000 is not working. As per internet search, Net 4 India Limited shutdown the offices across India without informing customers and partners which is void of ICANN code of conduct. They are not allowing to renew the domains and not even providing domain Auth-Code so as to prevent domain transfer. ICANN Please help us to list Net 4 India Limited on Bulk Transfer Page.”*
- *“Please help me to transfer more than 40 domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful.”*
- *“I Have more than 150 Domains Under Net4 India some of them are under redemption and some are expired & some are in near expiry. Please ICANN help me to transfer all my domains from Net 4 India limited as early as possible as my domains are getting expired. Please list Net 4 India Limited on Bulk Transfer page. ICANN Please do the needful.”*
- *“Looks like ICANN continues monitoring Net 4 India Limited till we all will be finished, our all domains get expire. Mr. Jamie Hedlund please wake up and do not let us die. We are suffering every day and day by day situation will be worsen for Net 4 India customers/users. Please take concrete action and do not let ICANN becomes I CANNOT....”*

- *“I have more than 18 domains with net4 . some of them have expired in november and dec not able too renew or transfer them.please help”*
- *“I am [REDACTED] we having 2 accounts -in Net4-india with 8 + 3 Domain , as Net4 team not responding .. we not able to renewed our some of Domain and -in that 2 Domain also got expired. now there is total 6 + 3 = 9 Domain is there ; I logged in to there console for Auth CODE request but that also not happening from many weeks .. we tried .. Need your help in this to get Auth Code of all our Domain -in Net4 so we can transffer it to other DNS provider below is the list we have 2 accounts with you [REDACTED] please help us to get Ath-CODE for all our above DOMAIN asap...”*
- *“Hello, we are also having problem with Net4 support like renewal, DNS management, whois record... Pls. help us how to solve these issue. Thankyou”*
- *“We tried contact Net4India but there is no response on phone/email. Please help us...All my domains are down.”*
- *“Tired of contacting Net4. No response anyway. Various tickets opened, emails send which bounced back, no contacts. Renewed my two domains in Sept'20 for 5yrs, payment done but order status yet not updated. Getting afraid whether my domain if not renewed, our company's all emails and hosting services will get stop which will lead to huge business loss. Please help how can I transfer my 3 domain from Net4 to other service provider as not getting any help from net4 in any matter. Thanking you”*
- *“Hi. I have 15 domains registered on Net4. I am trying to get my contact details updated on Net4 Website. I also tried to generate authorization code but there is no response from Net4. I tried visiting their office, which is closed now. The call center/backend number +91-11-45980000 is also not working. I also wrote to corporatesupport at net4 dot in on 27th October 2020 and there is no response from them till date. Please help as I need the domains to get transferred to another vendor as soon as possible. I tried to update the name server for one domain. The same does not get updated. I had to take a separate domain on another vendor to host my website. When I renewed my website or purchase a new one, I am not even able to get the GST invoice. Neither the same gets updated on the GST Site*

against my GST number which is already updated on my Net4 login. I feel so trapped with net4 as I need the domain for my work.”

Annexure F

Topics: [Bankruptcy](#), [Domain Registration](#), [ICANN](#), [National Internet Exchange of India](#), [Net 4 India](#)

As Net 4 Buckles Under Bankruptcy Proceedings, Customers Left With Nobody To Turn To

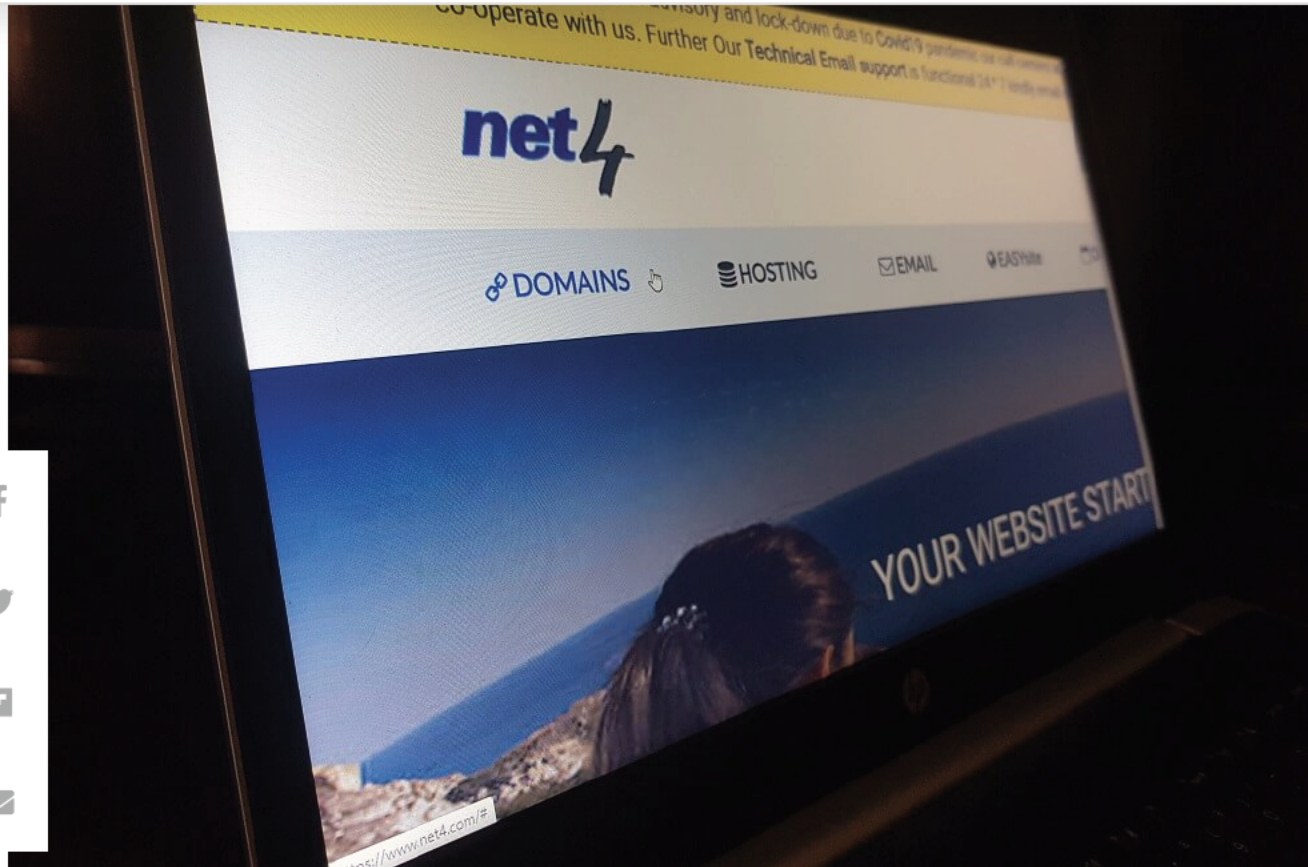


By **Aroon Deep** Published September 17, 2020



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On September 7, Ruchit Kapadia couldn't access his email. He was able to send emails, but not receive them. Kapadia works in Mumbai at his family's garment export company, DKK Exports, and administers the bulk of his business through email. "My business has come to a standstill, because I can't access my email," he lamented. Since all his clients are based abroad, email is the only formal way he has of communicating with them. It's the only way he can send invoices, take orders, and negotiate with buyers.

Upon investigating, he found out that his company's lease over his business's domain, dkkexports.com, had expired on August 13.

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said. But his registrar, that is, the website where he bought the domain name, automatically offered him some more time to make a renewal payment. So he paid. But the renewal never happened.

So Kapadia called up Net 4’s customer care number, 011-45980000. He was not able to get through to a real person. So he tried to call up one of their offices. Nobody picked up. He tried Net 4’s multiple outposts over the phone – Delhi, Mumbai, Bangalore, Chennai, Pune and Kolkata. Nobody was picking up. In Delhi, the number itself was disconnected, Kapadia said.

 e sent some people to the Delhi office to see if he could get in touch with someone in person. The office was closed. He also sent someone to the Pune office, but it had apparently been shut for three years.

 ustrated, he went on Twitter to voice his complaints. He wasn’t the only one. Many users on the site have been aghast at the prospect of losing access to their or their business’s online identity. One user [tweeted](#), “When India is working virtually Net4 has disappeared illegally, putting thousands in misery in these hard times. Please let us transfer our domains.”

Meanwhile, Naresh Gupta, a Noida-based startup executive at ANR Glocal, and his colleagues couldn’t access their email, which had a custom address with the domain name of the company, anrglocal.in. “First, I tried to call the customer care number, but it always came busy. Then I wrote an email to the customer care [corporatesupport@net4.in]. There was no response,” he said. Gupta wanted to downgrade his email plan since his inboxes didn’t need much storage, but an error prevented him from ending the expired plan, and no company representatives seemed online to take his call.

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initial package can be discontinued. We have been trying to get in touch with their customer support, but the line is always engaged.”

To make matters worse, Net 4’s website was down briefly. After the site came back up, Gupta was able to move his email to a different service, even as his domain name [remained](#) registered with Net 4.

Arjun Shah, an artist manager who runs the firm Shark & Ink in Mumbai, was not able to transfer his domain name (sharkandink.com) to a different registrar, complicating things for his business. “Because that transfer didn’t ppen, my email server was down. If you don’t have email for a week, and meone gets an auto-response saying that the domain doesn’t exist, people sume the worst, that the company has shut down.” Like many other users, ah was trying to transfer his domain because he was not able to renew it on t 4.

mediaNama spoke to over half a dozen users who faced these issues and struggled to get in touch with Net 4. Twitter has seen a growing chorus of helpless domain holders tagging the [IT Minister](#), the [Prime Minister](#), [TRAI](#), or anyone they think could help. Users, especially businesses, have been distraught at the prospect of losing access to their websites and email inboxes.

Who is a domain registrar?

Domain registrars are companies that sell domain names like medianama.com. Many registrars also provide services like website hosting and email. Net 4 is a registrar that did this.

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Net 4 customers are not able to reach any person within the company for support. We tried calling the company, but its phone lines are either disconnected or calls don't connect to any human operator. It is unclear if the company is even operating with skeletal staff. Net 4's website is up, but little else is visible.

Net 4's financial troubles

Net 4 started life as an internet service provider in 1985 but transformed into a main name registrar around the time internet businesses started cropping up around the world. At one point, the company was reportedly India's largest registrar, with over 1 lakh generic Top Level Domains (like .com, .net, etc.) under management.

In 2011, it was a seemingly healthy business — profits had increased almost two-fold year over year, and the company had even completed a strategic acquisition. It had revenues well into the hundreds of crores with commensurate profits, and data centres and offices in six cities. It worked with companies like Verizon, British Telecom, DeBeers, and ITC.

But all that growth disappeared — starting in 2002, Net 4 started to borrow money from the State Bank of India and continued to do so over the years. By 2017, it was running losses. This was also around the time the company was associated with a large-scale Twitter hack, where it denied any responsibility.

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Reconstruction.

The company has intermittently been in financial trouble since then. The same year SBI declared Net 4 an NPA, its founder and Managing Director Jasjit Singh Sawhney was [arrested](#) as the company did not pay the service tax it had collected from customers. Sawhney is no longer a director at the company and lives in the UK, according to one of his lawyers cited in an NCLT [order](#).

In 2017, Net 4 [reported](#) a quarterly loss of Rs 4.22 crore. In the following year, it was [delisted](#) from the National Stock Exchange and the Bombay Stock Exchange. One former employee told MediaNama that the company was struggling to pay employees their wages on time as late as 2019, and that it had completely stopped paying out salaries amid the COVID-19 pandemic, with employees largely no longer showing up at work.

Net 4's insolvency proceedings [started](#) last March, and hearings in the matter are ongoing at the National Company Law Tribunal. In one [judgement](#) from March 2019, the NCLT appointed Vikram Bajaj, an insolvency expert registered with the Insolvency and Bankruptcy Board of India, as a "Resolution Professional" in the matter. On being contacted by MediaNama, Bajaj refused to comment on the situation.

According to Domain Incite, which first [reported](#) the insolvency proceedings in 2019, Net 4 had over 100,000 domain names under management as of February 2019.

A message on Net 4's website warns customers of increased wait times on support calls, but only till August 15. It has been a month since that end date, and customers seem to be facing a company that may as well not exist rather

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Vijayashankar Nagarajarao, a cyberlaw consultant who goes by the name Naavi, said in a [blog post](#) in July that ICANN and the Ministry of Electronics and Information Technology needed to step in to make sure customers weren't locked out of their websites. He noted that this kind of situation, where Net 4's customer support went silent and its systems stopped working as intended, already [happened](#) once in 2017.

Net 4 did not return our request for comment.



ICANN and registrars

Registrars like Net 4 are accredited by the International Corporation for Assigned Names and Numbers. Many users are reaching out to ICANN's India head, Samiran Gupta, for help on renewing their Net 4 purchases. According to multiple emails we obtained from customers, ICANN is referring users to file individual complaints:

With regard to Net4India, the company is in a legal dispute with several creditors. The matter was referred for insolvency proceedings at the National Company Law Tribunal in 2019. The tribunal appointed a resolution professional who is coordinating with ICANN on matters related to compliance of ICANN's registrar agreement, including renewals and transfers of domain names. Since you are facing challenges in renewal or transfer of domain names, please use the Transfer Complaint form at

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[Source: ICANN email to customers]

While ICANN coordinates systems internationally for namespaces and domain names, individual domain registries also have to license registrars. For example, the National Internet Exchange of India (NIXI) operates Registry.in, which authorises registrars to sell the .in and .bharat domain names. Last year, Net 4 was [listed](#) by NIXI as a “top-performing” registrar. As of writing, the company has been [moved](#) to the bottom of the “other performers” list.



“ICANN did not anticipate the problem of a Registrar walking away leaving the customers in the lurch,” Naavi [wrote](#) earlier this year. “Now it is the responsibility of ICANN to sort out this issue. Otherwise, there could be legal action against the representative of ICANN in India,” he warned, referring to Net 4.

While Domain Incite, which first [reported](#) Net 4’s insolvency process, reported that Net 4 has been “suspended”, we have reached out to ICANN for more information on what exactly is being done to protect users’ interests.

It is worth noting that ICANN’s master agreement with registrars [entitles](#) them to a termination of contract if a registrar has been tangled in insolvency proceedings for more than a month. But they don’t seem to have taken advantage of this clause. ICANN also says on its [complaints page](#) that it cannot intervene when complaints are made regarding country-specific domain names. We have sent a query to NIXI, which operates the .in registry, to find out if they are taking action on behalf of Net 4 customers.

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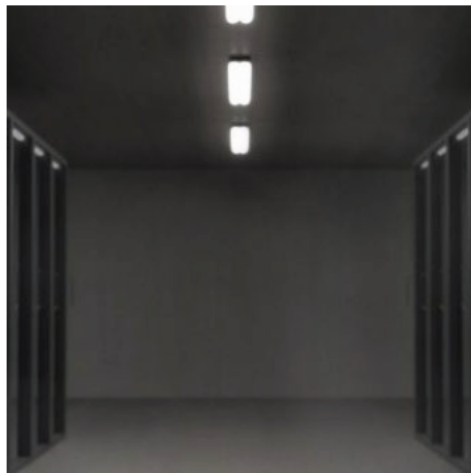
individual complaints. Several businesses could be affected in the meanwhile – the company [claims](#) to have thousands of businesses signed on, such as Airtel, CNBC TV18, Essar, and TCS. As more of these customers approach expiry dates for their services, the impact could grow.

The situation may remain uncertain until Net 4's financial troubles are cleared up. A so-called resolution plan is [pending](#) at the National Company Law Tribunal, whose principal bench said in an order that it would look at the plan only after considering a few more issues. The next hearing, in that case, is [set](#)

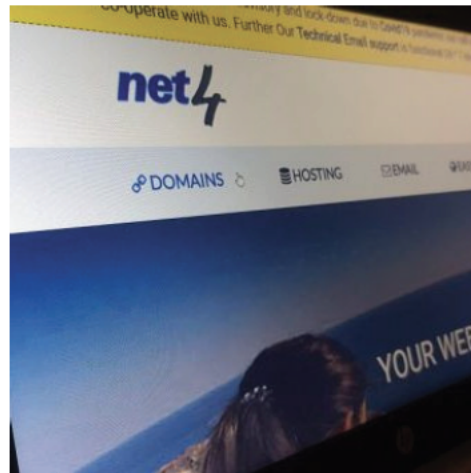
for October 1.



You May Also Like



NIXI Will Not Cancel .IN Domains Issued



Net 4 India Shareholding



'GoDaddy, Other Domain Registrars



ICANN Rejects .ORG Sale Proposal To

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Aroon Deep 🕒 OCTOBER 9, 2020

₹30 Lakh Pending

Aroon Deep 🕒 OCTOBER 9, 2020

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Trisha Jalan 🕒 AUGUST 31, 2020

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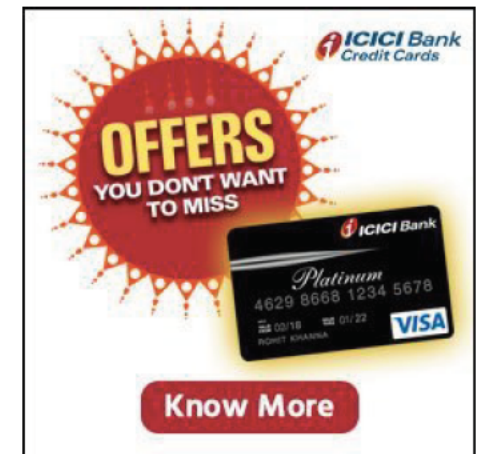
TECHNOLOGY

Life

Net4India Remains Incommunicado Leaving Lakhs of Domains and Clients in the Lurch

Moneylife Digital Team
11 December 2020

      9 

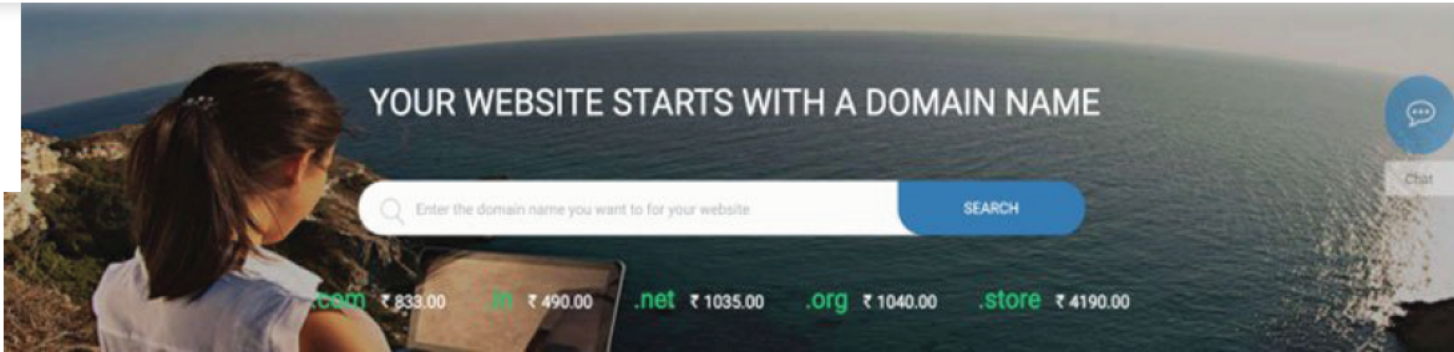


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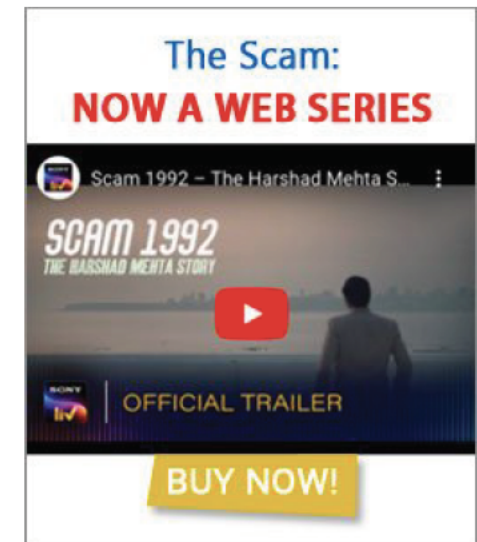


UPDATED on 14 December 2020 at 12 30pm to add information on Net4India grievance redressal as shared by Mr Vikram Bajaj, RP for the company

Net4India Ltd, the largest domain registrar in India that is accredited with Internet Corporation for Assigned Names and Numbers (ICANN), has become inaccessible to its clients. Neither queries and emails sent by clients have been evoking any response, nor there is any communication coming out from the company. While media reports cite financial difficulties faced by the company, Net4India's abrupt move to go out of reach has left lakhs of domains and its clients for various services in the lurch. Some of the domains registered with Net4India include IndianBank.in and AndhraBank.in.

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azdi Tantra from ON-LYNE says, "We have almost 150 domains registered for our clients through Net4India. We are totally stuck as we are not able to renew domains, a few of which have already expired. We even tried to transfer domains to another registrar but are not getting the authorization code from them."

"We understand that all their offices across India are closed and there is no physical interaction possible. All emails sent to them are not responded to. This is putting us and our clients to lot of trouble, including loss of business and reputation," Mr Tantra, a regular columnist of Moneylife, added.



SAGLASS
@SaglassInd



Dear @inregistry Since Net4India has shut down, we have put in a request for an authcode, in order to initiate the transfer for which all documents have been submitted a month back. We'd appreciate if you could let us know the status of our request. Thank you.

1:02 PM · Dec 1, 2020



See SAGLASS's other Tweets



MDCRC



Thanks again.

 **Samiran Gupta** @Samiran01

Replying to @mdcrcindia

Please email me at samiran.gupta@icann.org

9:46 AM · Dec 8, 2020



See MDCRC's other Tweets



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As per media reports as on end February 2019, Net4India had over 100,000 generic top level domains (gTLD) under its management. The gTLDs includes almost all .com and other legacy gTLDs.

"The trouble started a few years ago when Net4India took loans and failed to repay, therefore, Edelweiss Asset Reconstruction Company sued Net4India to get its money back in March 2019. Furthermore, in June 2019, ICANN had suspended their ability to create new domains and had initiated inbound transfers. This was done due to the ongoing insolvency proceedings," a [report from Foetron](#) says.

There are two issues with Net4India. One is an order passed by the National Company Law Tribunal (NCLT) and subsequent action taken by ICANN. On 8 March 2019, the NCLT bench at New Delhi issued an interim order in the Net4India matter and appointed Vikram Bajaj, as resolution professional. This was the



n 2014, a year later, when the loan turned NPA, SBI sold this debt to Edelweiss.

However, Mr Bajaj, the resolution professional appointed for Net4India denied that Net4India has closed its business. In an email to Moneylife, he says, "...the committee of creditors has already approved a resolution plan involving change of management, which is sub judice before the NCLT and upon approval of resolution plan by the NCLT and implementation of resolution plan the Net4India shall continue as a going concern."

After the NCLT order, ICANN, in June 2019 suspended Ne4India's ability to create new domains and initiated inbound transfers.

ICANN is an international body with responsibility for Internet Protocol (IP), country code (ccTLD) and top level domain management

A [report from MediaNama](#) says, the same year SBI declared Net4India as an NPA, its founder and managing director Jasjit Singh Sawhney was arrested as the company did not pay the service tax it had collected from customers. Mr Sawhney, however, is no longer a director at the company and lives in the UK, according to one of his lawyers cited in an NCLT order.



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employees their wages on time since 2017, and that it had completely stopped paying out salaries amid the COVID-19 pandemic, with employees largely no longer showing up at work

On Twitter, many users have complained that no phone call or email is being answered by Net4India. Reports say Net4India is a domain registrar company with around 90,000 website hosting, 1.5 million corporate emails and 3.75 lakh domain registrations. The company's website is also down.



Aiat Institute
@aiatinstitute



@Net4India

We are not able to change the NS in our domain, Please Update NS in Following Domain

jobkatta.com

spardhaclass.com

jobnagpur.com

you are not responding on your support : TT-20201201-191221

12/1/2020

Kindly Update Name server above domain

3:54 PM · Dec 3, 2020



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Urgent Help required.

Net4 closed doors without information.

My Emails & website are not working. I cannot even transfer domain to [#goDaddy](#) without getting code from [#net4india](#) [#DigitalIndia](#)

1:36 AM · Dec 10, 2020



2 See Dr CK Taneja's other Tweets

**Mahrukh Inayet**
[@mahrukhinayet](#)Impossible to reach [@Net4India](#) - None of your phones are working. No tech or customer support available. Mumbai office shut for 8 months. How does one do business with you? Pls contact when you see this [@studio_talk](#) [@vicsawant](#)

11:58 AM · Sep 22, 2020



8 See Mahrukh Inayet's other Tweets

Many of the clients of Net4India had written to the Prime Minister Narendra Modi, the Prime Minister's Office (PMO), the ministry of electronics & information



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[@PMOIndia](#) [@narendramodi](#) [@nsitharaman](#) [@rsprasad](#) [@inregistry](#)
[@Gol_MeitY](#) Bringing attention to clear and present danger to critical operation of websites of customers of [#net4india](#) [#DigitalIndia](#)

Vijayashankar Nagarajaro (Naavi) [@Naavi](#)
NCLT Order on Net4India is killing 70000 + customers and needs immediate modification [naavi.org/wp/nclt-order-...](#)

 **Vipin**
[@vipinpv](#)

Hope you take this seriously many of our banks are using net4india [#net4india](#) [#net4in](#) [@Naavi](#)

[See Vipin's other Tweets](#)

Bala D Joshi
@baladjoshi

[@GoI_MeitY](#) [@OfficeOfRSP](#) Please save Indian IT industry from [@net4in](#) fraud. Allow us to transfer our domains

11:16 PM · Oct 13, 2020

[See Bala D Joshi's other Tweets](#)

ICANN, on its part, is however, responding to clients of Net4India. However, it has a limited role to play in India ICANN, reportedly says, it is working with the Indian government and the MeitY about transferring responsibility of domains and email registered on Net4India to another Indian company. But so far there is no progress.

On the one hand, there are tremendous efforts by the union government to push India into the digital age, while end-users continue to face serious issues. The Net4India case, however, is very bad for the country's reputation in the information technology (IT) sector and all its clients hope to see some light at the end of the tunnel



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ankaj.s@net4.com) and an email ID icannresolutions@net4.com was setup. These are very much functional and the issues addressed here are being regularly addressed. I am also trying to address exigencies and escalations."



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REPLY



diaselvis 3 days ago

We need to report this to cybercell as their payment gateway is still operational with Upay. I just paid for renewal and then came across this article. This is a huge scam. The payment gateway on their site must be disabled instantly

REPLY



Dggohil 3w k go

Login into Net4 India cPanel and open this link in other tab where you can change A Records and CNAME easily,, [https //www net4 com/aspx/domain/DNS.aspx](https://www.net4.com/aspx/domain/DNS.aspx)

REPLY



yazdi 1 month ago

<https://www.naavi.org/wp/icann-has-to-find-a-solution-to-net4india-problem/>

REPLY



prime 1 month go

[#IL&FS](#)[#DHFL](#)[#Covid19](#)[#Anugrah](#)[#SEBI](#)[#RBI](#)[#NCLT](#)[#NSEAlgoScam](#)[#PACL](#)[#PMC Bank](#)[#Sterling Biotech](#)[#Ba](#)

oneplus6tsara 1 month ago

The worst part is they are accepting money for new registration. I bought my company domain recently without knowing the story. Now I am not able to do anything. Not able to transfer my domains. I have 6 important domains purchased for 5 years. :-(. They allowed me to renew my domains during Aug2020.

REPLY



Rupesh Chatterjee 1 month ago

In the report it says, the director of net4india has already resigned and now living in the UK

In the past few years, from the examples of Vijay, Nirav, etc, we have seen that when some company directors says they are travelling to UK, they most likely are planning to leave India for good.

How does all these runaways and absconders end up in the same country.

This should stop. UK, which otherwise stands up for humanitarian causes around the world, should not be a safehouse for the most wanted

Bring all these irresponsible directors back and make them accountable

REPLY



they run out of server capacity? Something seems off

This must really sting for its customers Shucks!

↩ REPLY



Rupesh Chatterjee n Reply to adityag 1 month ago

In the past few years, from the examples of Vijay, Nirav, etc, we have seen that when some company directors takes a flight to UK, they are leaving India for good.

Most of them are abandoning their motherland, with their ill gotten wealth and a new hope of living a luxurious fugitive life in europe under the protection of the newly purchased golden visas.

The credit worthiness of the establishment they owed in India gets completely leveraged to take loans. These loans taken with no intention of paying back, gets converted into digital currencies through layering and laundering, also into foreign villas under offshore company ownership to fund their fugitive retirement on the beachside

This should stop. UK, which otherwise stands up for humanitarian justice, is now becoming the hide house for law breakers and fugitives. Bring all these irresponsible directors back and make them accountable

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MAYA M



Annexure H

SCREENSHOT OF HOME PAGE OF NET4.COM

The screenshot displays the home page of Net4.com. At the top left is the Net4 logo. To the right, there is a contact number +91-11-45980000, a Login/Sign up link with a dropdown arrow, and a My Cart (0) link. Below this is a navigation menu with links for DOMAINS, HOSTING, EMAIL, EASYsite, OFFICE 365, CLOUDSERVER, SSL, and RESELLER. The main content area features a 'User Login' form with a user icon, input fields for 'Email/CRN ID' and 'Password', a 'Reset Password' link, and a green 'LOGIN' button. A 'Chat' button is visible on the right side. At the bottom, there is a link for 'Not Registered yet? Sign up'.

net4

+91-11-45980000 Login/Sign up ₹ My Cart (0)

DOMAINS HOSTING EMAIL EASYsite OFFICE 365 CLOUDSERVER SSL RESELLER

User Login

Email/CRN ID

Password

Reset Password LOGIN

Chat

Not Registered yet? Sign up