



21 June 2018

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

James Fromm
Omnis Network, LLC (IANA #143)
3655 Torrance Boulevard, Suite 230
Torrance CA 90503
United States

Email: fromm@omnis.com

Fax: +1 310 316 4991

Dear James Fromm,

Please be advised that as of 21 June 2018, Omnis Network, LLC ("Omnis Network") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 13 April 2015 ("RAA"). This breach results from:

1. Omnis Network's failure to provide the AuthInfo code to the Registered Name Holder ("RNH") of the domain name <symlogic.com> within five calendar days of the RNH's request, as required by Section I.A.5 of the Transfer Policy ("TP");
2. Omnis Network's failure to allow the RNH of the domain name <symlogic.com> to transfer its domain registration to another registrar pursuant to Section I.A.1 of the TP, or, alternatively, provide a valid reason for denial pursuant to Section I.A.3 of the TP; and
3. Omnis Network's failure to maintain and make available to ICANN registration data and records relating to dealings with the RNH of the domain name <symlogic.com>, as required by Sections 3.4.2 and 3.4.3 of the RAA.

Please refer to the attachment for details regarding these breaches.

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

1. Omnis Network's failure to provide domain name data in the specified response format, as required by Section 1.4 of the Registration Data Directory Service (Whois) Specification of the RAA ("Whois Specification"), the Advisory: Clarifications to the Registry and Registrar Requirements for WHOIS (port 43) and Web-Based Directory Services ("Clarifications") and the Additional Whois Information Policy ("AWIP");

2. Omnis Network's failure to provide current documentation demonstrating Omnis Network is in good standing, as required by Section 3.17 and Section 6 of the Registrar Information Specification ("RIS") of the RAA; and
3. Omnis Network's failure to publish its RIS correspondence address on Omnis Network's website, as required by Section 3.17 and Section 7 of the RIS of the RAA.

Additional Concerns

Omnis Network has previously remediated its prior pattern of incomplete and non-response to ICANN Contractual Compliance matters.

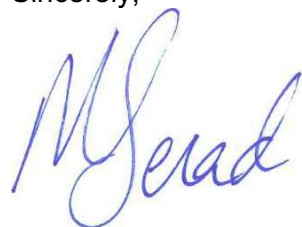
ICANN requests that Omnis Network cure these breaches by 12 July 2018, 21 days from the date of this letter, by taking the following actions:

1. Provide the AuthInfo code to the RNH and allow the transfer of the domain name <symlogic.com> to another registrar, or provide a valid reason for denial;
2. Provide copies of all written communications, including time-stamped communications, between Omnis Network and the RNH of the domain name <symlogic.com>;
3. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification, Clarifications and AWIP;
4. Provide ICANN with current documentation demonstrating Omnis Network is in good standing;
5. Publish on Omnis Network's website the correspondence address of Omnis Network, as specified in the RIS or, update Omnis Network's RIS form to reflect the correspondence address published on Omnis Network's website; and
6. Provide ICANN with the corrective and preventative action(s) that Omnis Network will take, with implementation date(s), to ensure:
 - a. timely and complete response to ICANN Contractual Compliance matters; and
 - b. Omnis Network will remain in compliance for previously remediated areas of noncompliance.

If Omnis Network fails to timely cure the breaches and provide the information requested by 12 July 2018, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Jennifer Scott at jennifer.scott@icann.org.

Sincerely,



Maguy Serad
Vice President
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to allow RNH to transfer its domain name registration to another registrar or, alternatively, provide a valid reason for denying the transfer

Section I.A.1 of the TP states that RNHs must be able to transfer their domain name registrations between registrars. Registrars may only deny a transfer request for the specific instances listed in Section I.A.3 TP. Omnis Network's failure to allow the transfer of the domain name <symlogic.com> or provide a valid reason for denial of transfer is a breach of Sections I.A.1 and I.A.3 of the TP.

Failure to provide AuthInfo code within five calendar days of RNH request

Section I.A.5 of the TP requires registrars to provide the RNH with the unique AuthInfo code within five (5) calendar days of the RNH's initial request. Omnis Network's failure to provide the AuthInfo code within five days of the RNH's request concerning domain name <symlogic.com> is a breach of Section I.A.5 of the TP.

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

Sections 3.4.2 and 3.4.3 of the RAA requires registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Omnis Network's failure to provide the requested registration records and data related to the domain name <symlogic.com> is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

Failure to display required Whois format

Section 1.4 of the Whois Specification of the RAA requires registrars to display domain name data in a specified format for Whois query responses. The format of responses shall contain all the elements and follow a semi-free text format outlined in Section 1.4 of the Whois Specification. Additional specifications to the format of Whois query responses are contained in the Clarifications and AWIP. Section 4.1 of the RAA requires registrars to comply with and implement all Consensus Policies, including the AWIP. Omnis Network's failure to display Whois data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA, Clarifications and AWIP.

Failure to provide ICANN with current documentation of legal status

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS, including current documentation demonstrating the registrar entity is legally established and in good standing. Omnis Network's failure to provide ICANN with current documentation demonstrating it is in good standing is a breach of Section 3.17 of the RAA and Section 6 of the RIS.

Failure to publish registrar's correspondence address on registrar's website

Section 3.17 of the RAA requires registrars to maintain and provide to ICANN the information specified in the RIS. In addition, registrars must publish on each website through which it provides or offers registrar services, the information specified in the RIS as requiring publication. Omnis Network's failure to publish its RIS correspondence address on Omnis Network's website is a breach of Section 3.17 of the RAA and Section 7 of the RIS.

Chronology:

Date of Notice	Deadline for Response	Details
13-Apr-2018	20-Apr-2018	ICANN sent 1st compliance notice via email to fromm@omnis.com .
13-Apr-2018	N/A	Email received from Registrar (fromm@omnis.com) insufficient to demonstrate compliance.
20-Apr-2018	27-Apr-2018	ICANN sent follow-up compliance notice via email to fromm@omnis.com . No response received from Registrar.
3-May-2018	10-May-2018	ICANN sent 2nd compliance notice via email to fromm@omnis.com .
7-May-2018	N/A	ICANN called Primary Contact at +1 310 316 1425. ICANN left voicemail with complaint details.
9-May-2018	N/A	Email received from Registrar (fromm@omnis.com) insufficient to demonstrate compliance.
17-May-2018	22-May-2018	ICANN sent follow-up compliance notice via email to fromm@omnis.com . No response received from Registrar.
25-May-2018	1-Jun-2018	ICANN sent 3rd compliance notice via email to fromm@omnis.com .
25-May-2018	N/A	ICANN sent 3rd compliance notice via fax to +1 310 316 4991. Fax unsuccessful.
29-May-2018	N/A	Email received from Registrar (fromm@omnis.com) insufficient to demonstrate compliance.
31-May-2018	5-Jun-2018	ICANN sent follow-up compliance notice via email to fromm@omnis.com . No response received from Registrar.
4-Jun-2018	N/A	ICANN called Primary Contact at +1 310 316 1425. ICANN left voicemail with complaint details.
9-Jun-2018	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
21-Jun-2018	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.