

Draft – Complaint to ICANN Contractual Compliance

(For Attorney Review Only)

Date: November 12, 2025

To: ICANN Contractual Compliance Department

Via: <https://www.icann.org/compliance/complaint>

Re: Formal Complaint Against Network Solutions, LLC (Registrar ID 2) – Violation of ICANN RAA and Transfer Policy Regarding “KIZILAYAVM.COM”

Dear ICANN Compliance Team,

I, **Selim Erman Duranay**, a private registrant and customer of Network Solutions, LLC, hereby submit this formal complaint under the **Registrar Accreditation Agreement (RAA)** and the **ICANN Transfer Policy**, regarding the domain name **KIZILAYAVM.COM**.

I. BACKGROUND AND TIMELINE

1. **June 26, 2025 – Backorder Placement:**

I placed a legitimate backorder for the domain name *KIZILAYAVM.COM* before it entered the “Pending Delete” period, via Network Solutions’ backorder system.

2. **June 21, 2025 – Domain Re-registration by Network Solutions:**

According to ICANN RDAP and WHOIS records, the domain was re-registered internally by Network Solutions or one of its affiliated resellers (NamePal.com #8009, LLC).

3. **July–August 2025 – Customer Support Communications:**

Multiple case records confirm Network Solutions’ possession of the domain:

- Case **E-367818** (August 2, 2025): confirmation email about transfer.
- Case **I-21900318** (August 6, 2025): agent verified “domain registered under Network Solutions backorder team on June 21, 2025.”
- Case **I-22004831** (August 13, 2025): agent reaffirmed that “the nameservers and A record are pointed to our default under-construction page.”

4. **August–October 2025 – No Auction, No Notification, No Transfer:**

Network Solutions failed to initiate a transparent auction, failed to inform me of competing claims, and failed to transfer the domain once the ICANN 60-day transfer hold expired.

5. **Current State:**

As of October 2025, the domain *KIZILAYAVM.COM* remains under the internal control of Network Solutions’ infrastructure and resolves to a NetworkSolutions-branded placeholder page.

II. NATURE OF THE VIOLATION

Network Solutions has violated the following ICANN-mandated provisions:

- **RAA §3.7.7.9:** Obligation to operate in good faith and in accordance with ICANN Consensus Policies.
- **ICANN Transfer Policy (Section I.A):** Failure to process a lawful transfer request and to maintain transparency during inter-registrar or intra-registrar transfers.
- **ICANN Expired Registration Recovery Policy:** Improper handling of expired and backordered domain names.

Additionally, Network Solutions' retention of this domain constitutes a conflict of interest, as it both administers and commercially benefits from the backorder process while withholding the asset from the rightful claimant.

III. EVIDENCE AND DOCUMENTATION

All supporting materials—including correspondence, chat transcripts, screenshots, WHOIS data, and order confirmations—are archived at:

 <https://case.seed.tr>

Specific case evidence includes:

- Case **E-367818** (Aug 2, 2025, confirmation email)
- Case **I-21900318** (Aug 6, 2025, transcript)
- Case **I-22004831** (Aug 13, 2025, transcript)

These clearly demonstrate that Network Solutions acknowledged both the backorder and its internal possession of the domain, yet failed to act in accordance with ICANN policy.

IV. REQUEST FOR ICANN ACTION

I respectfully request that ICANN:

1. Conduct a formal compliance investigation into Network Solutions, LLC (Registrar ID 2) and its affiliate NamePal.com #8009, LLC.
2. Determine whether the registrar improperly retained or transferred the domain *KIZILAYAVM.COM* in violation of ICANN's policies.
3. Direct Network Solutions to release and transfer the domain to my control, as originally agreed in the backorder process.
4. Issue sanctions or compliance measures as deemed appropriate under the ICANN Registrar Accreditation Agreement.

V. COMPLAINANT INFORMATION

Complainant:

Selim Erman Duranay
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VI. DECLARATION

I declare that the information contained in this complaint is true and accurate to the best of my knowledge and is supported by documentary evidence stored at the provided archive link.

Sincerely,
Selim Erman Duranay
Individual Claimant
Ankara, Türkiye