

ADMINISTRATIVE PANEL DECISION

Skyscanner Limited v. John Connolly
Case No. D2025-3202

1. The Parties

The Complainant is Skyscanner Limited, United Kingdom, represented by Lewis Silkin LLP, United Kingdom.

The Respondent is John Connolly, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <sku-scanner.com> is registered with 123-Reg Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 11, 2025. On August 12, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 12, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Registration Private) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 13, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amendment to the Complaint on August 14, 2025.

The Center verified that the Complaint together with the amendment to the Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the “Policy” or “UDRP”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the “Supplemental Rules”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on August 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 4, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 9, 2025. On September 9, 2025, the Respondent sent an email communication to the Center.

The Center appointed Gill Mansfield as the sole panelist in this matter on September 19, 2025. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant is company incorporated in the United Kingdom. It operates a travel search engine and booking site. The Complainant's services are available in more than 30 languages and in 70 currencies.

The Complainant has a portfolio of international trademark registrations, including (inter alia) the following:

United Kingdom trademark registration number UK00002313916 for SKYSCANNER (word mark) registered on April 30, 2004 in classes 35, 38 and 39.

International trademark registration number 1030086 for SKYSCANNER (word mark) registered on December 1, 2009 in classes 35, 39, and 42.

Canadian trademark registration number TMA786689 for SKYSCANNER (word mark) registered on January 10, 2011 in classes 35, 38 and 39.

The Complainant operates a website from the registered domain <skyscanner.net>.

The disputed domain name was registered on July 14, 2025 and at the time of the Complaint resolved to a parked page with Pay-Per-Click (PPC) links to third party websites.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainant contends that the disputed domain name is identical to or confusingly similar to a trademark in which the Complainant has rights. It refers to its portfolio of trademark registrations for the SKYSCANNER mark and submits that the mark enjoys a global reputation. It asserts that at the time of the Complaint, the SKYSCANNER website attracted tens of millions of unique visitors per month and that the SKYSCANNER application has been downloaded over 70 million times. It contends that the disputed domain name incorporates a misspelling of the Complainant's SKYSCANNER mark where the "y" is replaced the adjacent key on the keyboard "u", and a hyphen is added between the "sku" and "scanner" elements. It submits that the composition of the disputed domain name is classic typo-squatting.

It further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that as far as it is aware the Respondent has no registered rights in any trademarks which comprise all or part of the disputed domain name, and that the Complainant has not given its consent for the Respondent to use its registered trademarks in a domain name registration. It asserts that the disputed domain name resolves to a parked domain containing PPC links that advertise the services of other businesses, some of which directly compete with or are in related fields to that of the Complainant. It refers to Section 2.9 of the WIPO Panel Views on Selected UDRP Questions, Third Edition, (["WIPO Overview 3.0"](#)), in support of the position that such a use does not represent a bona fide offering of goods or services. It also asserts that not only is it likely that the Respondent was aware of the Complainant's rights prior to registering the disputed domain name but that visitors would mistakenly believe that there is an association with the Complainant.

In addition, the Complainant contends that the disputed domain name was registered and is being used in bad faith. It argues that the disputed domain name was registered over 20 years after the Complainant acquired rights in the SKYSCANNER mark and that the Respondent was aware of the reputation in the SKYSCANNER mark at the time the disputed domain name was registered. It submits that, given the global fame of the mark, there is no plausible reason for this, other than the Respondent seeking to profit by creating a misleading link between the disputed domain name and the Complainant's mark. It submits that the disputed domain name was registered with the Complainant's business in mind and that the use of the disputed domain name to generate PPC traffic constitutes bad faith.

B. Respondent

The Respondent did not reply to the Complainant's contentions. The Respondent sent an email to the Center dated September 9, 2025, stating that it had replied within the deadline and had copied [...] who had acknowledged receipt. The Panel believes [...] may be a reference to the Complainant's representative. However, the Center received no such response and the email itself did not contain any substantive response to the Complaint.

6. Discussion and Findings

Under paragraph 4(a) of the Policy the Complainant carries the burden of proving:

- (i) that the disputed domain name is identical or confusingly similar to a trademark or service mark which the Complainant has rights, and
- (ii) that the Respondent has no rights or legitimate interests in respect of the disputed domain name, and
- (iii) that the disputed domain name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The disputed domain name comprises an obvious misspelling of the Complainant's SKYSCANNER mark where the "y" is replaced with a "u" (with the addition of a hyphen between the "u" and the word "scanner"). The Panel notes that the letters "y" and "u" are adjacent on a keyboard. A domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant trademark for the purposes of the first element. [WIPO Overview 3.0](#), section 1.9.

The applicable Top-Level Domain ("TLD") in a domain name is a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1. As such, the TLD ".com" in the disputed domain name is disregarded for the purposes of the first element confusing similarity test.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the difficult task of “proving a negative”, requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent has not rebutted the Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those

The Panel finds that the Complainant has not given its consent for the Respondent to use its registered trademarks in a domain name registration. The Respondent is not commonly known by the disputed domain name. The Panel notes that the name disclosed by the Registrar is “John Connolly”. There is no evidence of use, or demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services, or of legitimate noncommercial or fair use of the disputed domain name without intent for commercial gain to misleadingly divert customers. In fact, at the time that the Complaint was filed the disputed domain name resolved to a parked page with PPC links that redirect Internet users to third-party websites including those related to travel, airlines and flights.

The use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where, as in this case, such links compete with or capitalise on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users, [WIPO Overview 3.0](#), section 2.9.

The Panel also notes the composition of the disputed domain name which comprises the Complainant’s well-known mark with the “y” in SKYSCANNER substituted with a “u”, and a hyphen inserted between the “u” and the word “scanner”. The Panel finds that this is an instance of typo-squatting.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption on bad faith. [WIPO Overview 3.0](#), section 3.1.4.

In the present case, the Panel notes that the disputed domain name was registered more than 20 years after the Complainant’s registration of the SKYSCANNER mark. Having reviewed the available record the Panel finds that the Complainant’s mark has achieved considerable reputation and is well known worldwide. In view of that worldwide reputation it is implausible that the Respondent did not have knowledge of the Complainant’s mark at the time the disputed domain name was registered.

As already noted above by the Panel, the record shows that the disputed domain name resolves to a parked page containing PPC advertising links. This constitutes bad faith under paragraph 4(b)(iv) of the Policy. The Panel finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement.

The Panel finds that the Complainant has established the third element of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain name <sku-scanner.com> be transferred to the Complainant.

/Gill Mansfield/

Gill Mansfield

Sole Panelist

Date: October 3, 2025