

ADMINISTRATIVE PANEL DECISION

American Airlines, Inc. v. Compsys Domain Solutions Private Limited,
Compsys Domain
Case No. D2025-4521

1. The Parties

The Complainant is American Airlines, Inc., United States of America (“USA” or “United States”), represented by Greenberg Traurig, LLP, USA.

The Respondent is Compsys Domain Solutions Private Limited, Compsys Domain, India.

2. The Domain Name and Registrar

The disputed domain name <americanairlineswifi.com> is registered with Tirupati Domains and Hosting Pvt Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 31, 2025. On November 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 4, 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 (Domain Whois Protect Service / REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 6, 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 amended Complaint on November 6, 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 November 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 2, 2025.

The Center appointed Erica Aoki as the sole panelist in this matter on December 8, 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 a major international airline and one of the largest air carriers in the world. The Complainant was founded in 1930s and provides passenger and cargo air transportation services to hundreds of destinations worldwide.

Over several decades, the Complainant has established a substantial global reputation in the airline industry and related services, including in-flight connectivity and Wi-Fi services.

The Complainant is the owner of numerous trademark registrations for the trademark AMERICAN AIRLINES, which it uses in connection with airline transportation services, travel-related services, and associated products.

These trademark registrations predate the registration of the disputed domain name.

Among others, the Complainant owns the following trademark registrations:

- United States Trademark Registration No. 514294, AMERICAN AIRLINES, registered on August 23 , 1949, in connection with airline transportation services (International Class 39);
- International Trademark Registration No. 1266184, AMERICAN AIRLINES, registered on December 31, 2014, designating multiple jurisdictions including India, and covering airline-related services (International Classes 35, 37, and 39).

These registrations remain valid and in force and establish the Complainant's longstanding trademark rights in the Complainant's trademark.

The Complainant operates several official domain names incorporating its trademark, including <aa.com> and <americanairlines.com>, which are used to provide information about the Complainant's services, manage bookings, and offer customer support, including information related to in-flight Wi-Fi and connectivity services.

The disputed domain name was registered on October 27, 2017, and resolves to a website with pay-per-click ("PPC") links.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied all three elements required under paragraph 4(a) of the Policy for the transfer of the disputed domain name.

First, the Complainant asserts that the disputed domain name is confusingly similar to its well-known Complainant's trademark.

The disputed domain name wholly incorporates the Complainant's trademark and merely adds the descriptive term "wifi," which directly relates to the Complainant's in-flight connectivity services. According to the Complainant, such addition does not dispel confusing similarity and instead reinforces the false association with the Complainant.

Second, the Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not affiliated with the Complainant and has never been authorized or licensed to use the Complainant's trademark.

The Complainant contends that there is no evidence that the Respondent is commonly known by the disputed domain name. According to the Complainant, the Respondent's use of the disputed domain name creates a misleading impression of affiliation with or endorsement by the Complainant and does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use.

Third, the Complainant argues that the disputed domain name was registered and is being used in bad faith. The Complainant states that, given the worldwide fame and longstanding use of the Complainant's trademark, the Respondent must have been aware of the Complainant's rights at the time of registration.

The Complainant further submits that the Respondent registered and used the disputed domain name to intentionally attract Internet users by creating a likelihood of confusion with the Complainant's trademark as to source, sponsorship, affiliation, or endorsement, for commercial or other illegitimate purposes, which constitutes bad faith under paragraph 4(b)(iv) of the Policy.

Accordingly, the Complainant requests that the disputed domain name be transferred to the Complainant.

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant must prove:

- (i) the disputed domain name is identical or confusingly similar to a mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in the disputed domain name;
- (iii) the disputed domain name was 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 of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 1.7).

The Panel finds that the Complainant has demonstrated rights in respect of the Complainant's trademark for the purposes of the Policy through multiple registered trademark rights.

The disputed domain name incorporates the Complainant's trademark in its entirety.

The addition of the term "wifi" does not prevent the Complainant's trademark from being clearly recognizable within the disputed domain name. Panels have consistently held that the addition of a term to a complainant's trademark does not prevent a finding of confusing similarity where the trademark remains recognizable ([WIPO Overview 3.0](#), section 1.8).

The generic Top-Level Domain (“gTLD”) “.com” is a standard registration requirement and is disregarded for the purposes of assessing confusing similarity ([WIPO Overview 3.0](#), section 1.11.1).

Accordingly, the Panel finds that the disputed domain name is confusingly similar to the Complainant’s trademark. The first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets out a non-exhaustive list of circumstances by which a respondent may demonstrate rights or legitimate interests in a disputed domain name.

While the overall burden of proof in UDRP proceedings rests with the complainant, panels have consistently recognized that proving a respondent’s lack of rights or legitimate interests may involve the difficult task of proving a negative, as the relevant information is often within the respondent’s knowledge or control.

Accordingly, where a complainant establishes a prima facie case that the respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with evidence demonstrating such rights or legitimate interests. If the respondent fails to do so, the complainant is deemed to have satisfied the second element of the Policy ([WIPO Overview 3.0](#), section 2.1).

In the present case, the Panel finds that the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent is not affiliated with the Complainant and has not been authorized or licensed to use the Complainant’s trademark in any manner.

There is no evidence that the Respondent has been commonly known by the disputed domain name or by any name corresponding to it.

The disputed domain name incorporates the Complainant’s trademark in its entirety together with a term directly associated with the Complainant’s services. The composition of disputed domain name creates a misleading impression of affiliation with or endorsement by the Complainant.

The disputed domain name resolves to a website with PPC links. Panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users ([WIPO Overview 3.0](#), section 2.9). Such use does not constitute a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy, nor does it amount to legitimate noncommercial or fair use under paragraph 4(c)(iii).

The Respondent has not submitted any response or evidence to rebut the Complainant’s prima facie showing or to demonstrate any of the circumstances contemplated by paragraph 4(c) of the Policy.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name.

The second element of the Policy has been established.

C. Registered and Used in Bad Faith

For the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances which, if found to be present, shall be evidence of the registration and use of a domain name in bad faith.

The Panel finds that the evidence in the record establishes that the disputed domain name was registered and is being used in bad faith.

The Complainant's trademark is well known worldwide and significantly predates the registration of the disputed domain name in October 2017.

Given the longstanding and widespread use of the Complainant's trademark, as well as its global reputation in the airline industry, the Panel finds it implausible that the Respondent was unaware of the Complainant and its trademark at the time of registration.

The disputed domain name incorporates the Complainant's trademark in its entirety together with the term "wifi," which directly relates to the Complainant's in-flight connectivity services. This composition demonstrates that the Respondent intentionally targeted the Complainant and its services when registering the disputed domain name.

The Respondent's use of the disputed domain name further supports the finding of bad faith. The disputed domain name was used in a manner that created a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website. Such conduct constitutes evidence of bad faith under paragraph 4(b)(iv) of the Policy, which addresses the intentional attempt to attract Internet users by creating a likelihood of confusion with a complainant's mark for commercial or other illegitimate purposes.

Panels have consistently held that the registration of a domain name incorporating a well-known trademark, together with a term closely associated with the complainant's business, in order to create a misleading impression of affiliation, constitutes bad faith registration ([WIPO Overview 3.0](#), section 3.1.4).

The Respondent has not submitted any response to explain its registration or use of the disputed domain name, nor to rebut the Complainant's assertions. In the circumstances of this case, the Respondent's failure to participate in the proceedings further supports an inference of bad faith.

In light of the above, the Panel finds that the disputed domain name was registered and is being used in bad faith.

The third element of the Policy has been established.

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 <americanairlineswifi.com> be transferred to the Complainant.

/Erica Aoki/

Erica Aoki

Sole Panelist

Date: December 22, 2025