

ADMINISTRATIVE PANEL DECISION

The Southern Company v. Domain Privacy, Domain Name Privacy Inc.
Case No. D2025-5341

1. The Parties

The Complainant is The Southern Company, United States of America (“United States”), represented by Allure Security Technology, Inc., United States.

The Respondent is Domain Privacy, Domain Name Privacy Inc., Cyprus.

2. The Domain Name and Registrar

The disputed domain name <geogiapower.com> is registered with Udmain.com LLC, (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 19, 2025. On December 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 19, 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 (PERFECT PRIVACY, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 19, 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 December 19, 2025, and December 22, 2025.

The Center verified that the Complaint together with the amended 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 December 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 13, 2026.

The Center appointed Zoltán Takács as the sole panelist in this matter on January 19, 2026. 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 among the largest electric utility and energy service providers in the United States.

One of the subsidiaries under which the Complainant operates is Georgia Power, based in Atlanta, Georgia.

The Complainant is among others owner of the United States Trademark Registration No. 2169059 for the word mark GEORGIA POWER registered on June 30, 1998.

The disputed domain name that has active Mail Exchanger (“MX”) records was registered on February 15, 2025, and has been used to resolve to Pay-Per-Click (“PPC”) pages displaying links closely relating to the Complainant’s business, such as: “Compare Electricity and Gas Plans” and “Renewable Energy Providers”.

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 which is a purposeful misspelling of its GEORGIA POWER trademark is confusingly similar to the trademark;
- the Respondent has no rights or legitimate interests in respect of the disputed domain name since it is unable to rely on any of the circumstances set out in paragraphs 4(c)(i), (ii), or (iii) of the Policy;
- due to the recognition of the Complainant’s trademark in the electric power generation and distribution sector the Respondent likely knew of and targeted the Complainant’s trademark through registration of the disputed domain name; and
- use of the disputed domain name for PPC advertising targeting the Complainant’s sector and the presence of active MX records in the disputed domain name combined with typosquatting is evidence of bad faith under the Policy.

The Complainant requests that the disputed domain name be transferred from the Respondent to the Complainant.

B. Respondent

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

6. Discussion and Findings

A complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the complaint, namely that:

- (i) the domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- (ii) the respondent has no rights or legitimate interests in respect of the domain name; and
- (iii) the 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 disputed domain name is a misspelling of the Complainant's trademark differing from it by removal of the letter "r" from the trademark.

Domain names consisting of a misspelling of the complainant's trademark (i.e. typosquatting) are considered by UDRP panels to be confusingly similar to the relevant mark for the purposes of the first element. [WIPO Overview 3.0](#), section 1.9.

The Panel finds that the disputed domain name is confusingly similar to the Complainant's trademark and that 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 enumerated in the Policy or otherwise.

Based on the available records, the Complainant has not authorized, licensed, or allowed the Respondent to use its trademark (or in this case a misspelled variant of it) in the disputed domain name or in any other way that would confer validity or legitimacy upon such use.

Given that the disputed domain name is a classic example of typosquatting registration whereby the Respondent has intentionally sought to create confusion for Internet users unaware of the one-letter difference between the disputed domain name and the Complainant's trademark, the Respondent's use of the disputed domain name for monetization through PPC links closely related to the Complainant's business

does not represent bona fide offering of goods or services since it trades on goodwill associated with the Complainant's mark. [WIPO Overview 3.0](#), section 2.9.

The Panel finds that 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.

As mentioned above, the disputed domain name differs from the Complainant's trademark by removal of a single letter from the trademark, which is an example of typosquatting. UDRP panels have consistently found that the mere registration of a domain name comprising typos can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

Basic Internet searches for the disputed domain name return multiple links referencing the Complainant and its trademark. This, coupled with the fact that the Respondent chose a misspelled variant of the Complainant's trademark at construction of the disputed domain name in view of the Panel indicates that the Respondent must have been aware of the Complainant's trademark at the time of obtaining the disputed domain name and chose to register it to target the trademark. [WIPO Overview 3.0](#), section 3.2.1.

The disputed domain name has been used to resolve to PPC pages displaying links closely related to the Complainant's business. The purpose of such a use of the disputed domain name is clearly to attract Internet users to these pages for profit based on their confusing the disputed domain name with the Complainant's trademark, which is evidence of use of the disputed domain name in bad faith. [WIPO Overview 3.0](#), section 3.5.

Furthermore, in these circumstances, particularly noting the typosquatting nature of the disputed domain name, the Respondent's activation of MX records associated with the disputed domain name – enabling sending potentially fraudulent emails – creates a real and ongoing threat to the Complainant and is additional indication of the Respondent's bad faith.

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 <geogiapower.com> be transferred to the Complainant.

/Zoltán Takács/

Zoltán Takács

Sole Panelist

Date: February 2, 2026