ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
American Airlines, Inc. v. AMERICAN HAIRLINES INTERNATIONAL
Case No. D2026-0121

1. The Parties

Complainant is American Airlines, Inc., United States of America ("U.S."), represented by Greenberg Traurig, LLP, U.S.

Respondent is AMERICAN HAIRLINES INTERNATIONAL, U.S.

2. The Domain Name and Registrar

The disputed domain name <americanhairlines.com> (the "Domain Name") is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on January 12, 2026. On January 13, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On January 13, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Registration Private/ Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to Complainant on January 16, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on January 20, 2026.

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 Respondent of the Complaint, and the proceedings commenced on January 22, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 11, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on February 13, 2026.

The Center appointed Kimberley Chen Nobles as the sole panelist in this matter on February 18, 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

Complainant is an air carrier with domestic U.S. and international routes. Along with its affiliates, Complainant serves over 350 destinations in over fifty countries. Complainant owns numerous registered trademarks and service marks in numerous jurisdictions throughout the world, for the AA, AMERICAN and AMERICAN AIRLINES (referred to collectively as "AMERICAN AIRLINES") marks. Examples of such trademarks and service marks include:

- U.S. registered trademark number 5288639 for the AMERICAN word and design mark, registered on September 19, 2017;
- U.S. registered trademark number 514294 for the AMERICAN AIRLINES word mark, registered on August 23, 1949; and
- U.S. registered trademark number 1845693 for the AMERICAN AIRLINES word mark, registered on July 19, 1994.

Complainant has used its AMERICAN and AMERICAN AIRLINES trademarks, both alone and in combinations with other words and designs in connection with travel and transportation services, travel agency services and travel reservation services. Complainant also owns and operates the domain names <aa.com> and <americanairlines.com>, which redirects to Complainant's primary website. Complainant's website features general information about Complainant, traveling, and allows customers to book travel reservations around the world, view, change and cancel travel reservations, check in for flights, and view flight status.

The Domain Name was registered on March 4, 1998, and at the time of filing of the Complaint, directed to a Registrar parking page. However, the Domain Name was configured for active mail exchange (MX) capabilities.

5. Parties' Contentions

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

Notably, Complainant contends that (i) the Domain Name is confusingly similar to Complainant's trademarks; (ii) Respondent has no rights or legitimate interests in the Domain Name; and (iii) Respondent registered and is using the Domain Name in bad faith.

In particular, Complainant contends that it has trademark registrations and rights for AMERICAN AIRLINES and that Respondent registered and is using the Domain Name with the intention to confuse Internet users looking for bona fide and well-known AMERICAN AIRLINES products and services.

Complainant notes that it has no affiliation with Respondent, nor authorized Respondent to register or use a domain name, which includes Complainant's trademarks, and that Respondent has no rights or legitimate interests in the registration and use of the Domain Name. Rather, Complainant contends that Respondent has acted in bad faith in acquiring and setting up the Domain Name, when Respondent clearly knew of Complainant's rights.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, to succeed Complainant must satisfy the Panel that:

(i) the Domain Name is identical or confusingly similar to a trademark or service mark in which Complainant has rights;
(ii) Respondent has no rights or legitimate interests in respect of the Domain Name; and
(iii) the Domain Name was registered and is being used in bad faith.

Section 4.3 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1") states that failure to respond to the complainant's contentions would not by itself mean that the complainant is deemed to have prevailed; a respondent's default is not necessarily an admission that the complainant's claims are true.

Thus, although in this case Respondent has failed to respond to the Complaint, the burden remains with Complainant to establish the three elements of paragraph 4(a) of the Policy by a preponderance of the evidence.

A. Identical or Confusingly Similar

Complainant has provided evidence of its rights in the AMERICAN AIRLINES trademarks, as noted above. Complainant has therefore proven that it has the requisite rights in the AMERICAN AIRLINES trademarks.

With Complainant's rights in the AMERICAN AIRLINES trademarks established, the remaining question under the first element of the Policy is whether the Domain Name, typically disregarding the Top-Level Domain ("TLD") in which it was registered (in this case, is ".com") is identical or confusingly similar to Complainant's trademarks. See, e.g., *B & H Foto & Electronics Corp. v. Domains by Proxy, Inc. / Joseph Gross*, WIPO Case No. D2010-0842.

Here, the Domain Name is confusingly similar to Complainant's AMERICAN AIRLINES trademarks. These AMERICAN AIRLINES trademarks are recognizable in the Domain Name.

In particular, the Domain Name's inclusion of Complainant's AMERICAN AIRLINES trademarks in their entirety, with an addition of the letter "h", between "American" and "airlines" in the Domain Name, does not prevent a finding of confusing similarity between the Domain Name and the AMERICAN AIRLINES trademarks. See section 1.8 of the WIPO Overview 3.1.

Thus, the Panel finds that Complainant has satisfied the first element of the Policy.

B. Rights or Legitimate Interests

Under paragraph 4(a)(ii) of the Policy, a complainant must make a prima facie showing that a respondent possesses no rights or legitimate interests in a disputed domain name. See, e.g., *Malayan Banking Berhad v. Beauty, Success & Truth International*, WIPO Case No. D2008-1393. Once a complainant makes such a prima facie showing, the burden of production shifts to the respondent, though the burden of proof always remains on the complainant. If the respondent fails to come forward with relevant evidence showing rights or legitimate interests, the complainant will have sustained its burden under the second element of the UDRP.

From the record in this case, it is evident that Respondent was, and is, aware of Complainant and its AMERICAN AIRLINES trademarks and does not have any rights or legitimate interests in the Domain Name. Complainant has confirmed that Respondent is not affiliated with Complainant, or otherwise authorized or licensed to use the AMERICAN AIRLINES trademarks or to seek registration of any domain name incorporating these trademarks. The Panel notes that Respondent's name is "AMERICAN HAIRLINES INTERNATIONAL". However, Respondent is also not known to be associated with the AMERICAN AIRLINES trademarks and there is no evidence showing that Respondent has been commonly known by the Domain Name or the "AMERICAN HAIRLINES INTERNATIONAL" name. The Domain Name is inactive. Taking into account the reasons in Section 6C of the Decision, the Panel considers that Respondent's use of the "AMERICAN HAIRLINES INTERNATIONAL" name when registering the Domain Name does not confer rights or legitimate interests on Respondent under the circumstances of the case.

Accordingly, Complainant has provided evidence supporting its prima facie showing that Respondent lacks any rights or legitimate interests in the Domain Name. Respondent has failed to produce countervailing evidence of any rights or legitimate interests in the Domain Name. Thus, the Panel concludes that Respondent does not have any rights or legitimate interests in the Domain Name and Complainant has met its burden under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

The Panel finds that Respondent's actions indicate that Respondent registered and is using the Domain Names in bad faith.

Paragraph 4(b) of the Policy provides a non-exhaustive list of circumstances indicating bad faith registration and use on the part of a respondent, namely:

"(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product or service on your website or location."

The Panel finds that Complainant has provided ample evidence to show that registration and use of the AMERICAN AIRLINES trademarks long predate the registration of the Domain Name. Complainant is also well established and known. Indeed, the record shows that Complainant's AMERICAN AIRLINES trademarks and related products and services are widely known and recognized. Therefore, Respondent was more likely than not aware of the AMERICAN AIRLINES trademarks when it registered the Domain Name. See section 3.2.2 of the WIPO Overview 3.1; see also *TTT Moneycorp Limited v. Privacy Gods / Privacy Gods Limited*, WIPO Case No. D2016-1973.

The Panel therefore finds that Respondent's awareness of Complainant's trademark rights at the time of registration suggests bad faith. See *Red Bull GmbH v. Credit du Léman SA, Jean-Denis Deletraz*, WIPO Case No. D2011-2209; *Nintendo of America Inc v. Marco Beijen*, *Beijen Consulting, Pokemon Fan Clubs*

Org., and Pokemon Fans Unite, WIPO Case No. D2001-1070; and *BellSouth Intellectual Property Corporation v. Serena, Axel*, WIPO Case No. D2006-0007.

Moreover, the Domain Name's inclusion of Complainant's trademark AMERICAN AIRLINES in its entirety with an addition of the letter "h", between "American" and "airlines", further reflects the awareness that Respondent had of Complainant and its trademarks at the time of registration. Such adoption of Complainant's trademarks at the time of registration of the Domain Name illustrates Respondent's effort to mislead Internet users as to the Domain Name's association with Complainant.

At the time of filing of the Complaint, the Domain Name resolved to an inactive webpage, which does not prevent a finding of Respondent's bad faith. Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. WIPO Overview 3.1, section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of Complainant's trademark, and the composition of the Domain Name, and finds that in the circumstances of this case the passive holding of the Domain Name does not prevent a finding of bad faith under the Policy.

Despite being inactive, there is no indication or evidence that Respondent is preparing to use the Domain Name for any other alternate purpose, and in addition, the Domain Name had been configured with active MX capabilities, indicating that it facilitates the use of email that is associated with the Domain Name. Prior Panels have noted that such configuration of MX records evidences a likelihood of additional bad-faith use of the associated Domain Name to engage in fraudulent email or phishing communications. See, e.g., *Tetra Laval Holdings & Finance S.A. v. Himali Hewage*, WIPO Case No. D2020-0472 (concluding that evidence of active MX records indicated that the disputed domain name may be used for fraudulent email communications); *Ares Management LLC v. juandaohanjing (上海锐思人力资源有限公司)*, WIPO Case No. D2020-3254 (finding the respondent used the disputed domain name in bad faith based on evidence of active "MX records for the disputed domain name" which "indicate that the Respondent has connected the disputed domain name to email servers, which creates a grave risk that the Respondent may be using the disputed domain name for misrepresentations and/or phishing and spamming activities").

In the present circumstances, considering the distinctiveness and reputation of the AMERICAN AIRLINES trademarks, Respondent's use of a proxy service to shield its identity, the use of apparent false contact information, and the failure of Respondent to submit a response, the Panel finds that the passive holding of the Domain Name does not prevent a finding of bad faith, and that Respondent registered and is using the Domain Name in bad faith.

Therefore, the Panel finds that Complainant succeeds under the third element of paragraph 4(a) 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 Domain Name <americanhairlines.com> be transferred to Complainant.

/Kimberley Chen Nobles/
Kimberley Chen Nobles
Sole Panelist
Date: February 24, 2026