ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

American Airlines, Inc. v. Jin H. Park
Case No. D2026-0138

1. The Parties

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

The Respondent is Jin H. Park, Republic of Korea.

2. The Domain Name and Registrar

The disputed domain name <envoair.com> (the "Disputed Domain Name") is registered with TurnCommerce, Inc. DBA NameBright.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on January 13, 2026. On January 14, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On January 14, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that 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 January 19, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 8, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on February 10, 2026.

The Center appointed Flip Jan Claude Petillion as the sole panelist in this matter on February 12, 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.

On March 2, 2026, the Panel issued a Panel Order No. 1 by which the Panel (1) invited the Complainant to provide evidence as to the reputation of the ENVOY mark before the registration (or the Respondent's acquisition) of the Disputed Domain Name, and (2) invited the Respondent to comment on the Complainant's submission (if any).

The Complainant responded to the Panel Order No. 1 on March 5, 2026. The Respondent did not comment.

4. Factual Background

The Complainant, American Airlines, Inc., is an air carrier serving, together with its affiliate companies, over 350 destinations in over fifty countries, with nearly 7,000 daily flights.

Envoy Air, Inc. ("Envoy") is a wholly owned subsidiary of the Complainant, as well as the largest regional carrier for the Complainant's group. Established in 1998 as American Eagle Airlines, Inc., Envoy was founded after the merger of several regional carriers, consolidating into one of the largest regional airlines globally. Headquartered in Irving, Texas, USA, Envoy boasts significant operations in the Complainant's key hubs such as Dallas/Fort Worth, Chicago, and Miami. Through Envoy, the Complainant operates more than 160 aircraft on 1,000 flights to over 160 destinations. Envoy also has more than 20,000 employees that provide regional flight service to American Airlines travelers.

To distinguish itself from the American Eagle brand, which encompasses multiple carriers providing regional flight services for the Complainant, the company officially changed its name to Envoy Air, Inc. on April 15, 2014.

The Complainant is the owner of several ENVOY trademarks, including:

- ENVOY, USA word mark registered under No. 4867612 on December 8, 2015, in classes 37 and 39;
- ENVOY, European Union word mark registered under No. 008428427 on March 22, 2010, in class 35.

The Complainant's predecessor in interest, US Airways, obtained a USA word mark for ENVOY under No. 2186577 on September 1, 1998, in class 39, which claimed a first use date of February 27, 1997. This mark was assigned to the Complainant's group when US Airways merged with the Complainant in December 2013, and was subsequently cancelled on April 4, 2021, in view of the other ENVOY marks held by the Complainant.

The Disputed Domain Name was registered on June 14, 2011, and resolves to a parking page with pay-per-click ("PPC") links. This page also states that the Disputed Domain Name is for sale for an asking price of USD 7,826.

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 confusingly similar to a trademark in which it claims to have rights.

Second, the Complainant claims that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name, as, according to the Complainant:

- the Respondent registered the Disputed Domain Name without the Complainant's authorization or consent;

- the Disputed Domain Name misappropriates and is confusingly similar to the Complainant's ENVOY mark by adding the term "air" to a mistype of the Complainant's mark;

- the Respondent is not commonly known by the Disputed Domain Name;

- the Respondent has not used or prepared to use the Disputed Domain Name in connection with a bona fide offering of goods or services. Instead, the Respondent is using the Disputed Domain Name to resolve to a website that displays PPC or affiliate advertising links which presumably generate affiliate revenue for the Respondent when they are clicked by Internet users who arrive at the Disputed Domain Name by accident when searching for the Complainant. The Respondent has also listed the Disputed Domain Name for sale for USD 7,826 on Sedo.com, a domain name marketplace.

Finally, the Complainant claims that the Disputed Domain Name was registered and is being used in bad faith. In summary, according to the Complainant:

- long after the Complainant established its rights in the ENVOY mark, and with knowledge of that mark, the Respondent acquired the confusingly similar Disputed Domain Name to divert Internet traffic to websites garnering PPC or affiliate advertising revenue for the Respondent's commercial gain, causing disruption of the Complainant's business and creating a likelihood of confusion regarding source, sponsorship, affiliation, or endorsement;

- the Respondent has also listed the Disputed Domain Name for sale for USD 7,826 on Sedo.com, which is clearly far in excess of the Respondent's investment in the Disputed Domain Name;

- at the time of registration of the Disputed Domain Name, it is obvious that the Respondent had actual and constructive knowledge of the Complainant's ENVOY mark. In fact, the Respondent's actual knowledge of the Complainant's ENVOY Mark is the entire reason behind the Respondent's registration of the Disputed Domain Name. Furthermore, the mere fact that the Respondent has registered a domain name that incorporates the trademark of a well-known company is alone sufficient to give rise to an inference of bad faith;

- the Disputed Domain Name is so obviously connected with the Complainant and its services that its very use by someone with no connection to the Complainant suggests opportunistic bad faith;

- the Respondent appears to have attempted to set up the Disputed Domain Name for use to create email addresses and send email messages by creating MX (mail exchange) records, but misconfigured them.

B. Respondent

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

6. Discussion and Findings

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 Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The Panel observes that the Complainant's ENVOY mark is reproduced within the Disputed Domain Name except for the last letter "y". Given the inclusion of 4 letters out of 5, the Panel finds that the Disputed Domain Name can be considered confusingly similar to the incorporated mark for purposes of UDRP standing. WIPO Overview 3.1, section 1.7.

Additionally, the Panel finds that the addition of the term "air" does not prevent a finding of confusing similarity between the Disputed Domain Name and the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

It is well established that generic Top-Level Domains, here ".com", may be disregarded when considering whether the Disputed Domain Name is confusingly similar to a trademark in which the Complainant has rights. WIPO Overview 3.1, section 1.11.

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 a 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 3.1, 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.

The Panel notes that the Respondent has not apparently been commonly known by the Disputed Domain Name. According to the information provided by the Registrar, the Respondent is "Jin H. Park". The Respondent's registration and use of the Disputed Domain Name was not authorized by the Complainant.

The Complainant essentially adds the following claims:

- the addition of the term "air" to a mistype of its ENVOY mark does not distinguish the Disputed Domain Name but instead increases the likelihood of confusion based on the direct association of that word with the Complainant's airline and travel reservation services;

- misdirecting consumers to a page displaying PPC or affiliate links by misuse of the Complainant's trademark in the Disputed Domain Name does not constitute a bona fide offering of goods or services or rights or a legitimate interest in the Disputed Domain Name;

- the Respondent's attempts to sell the Disputed Domain Name well in excess of its out-of-pocket costs, while the Respondent was well aware it contains the Complainant's ENVOY mark, does not create rights and legitimate interests under the Policy.

The Respondent had the opportunity to demonstrate its rights or legitimate interests but did not do so. In the absence of a Response from the Respondent, the prima facie case established by the Complainant has not been rebutted.

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. Among these factors demonstrating bad faith registration and use are the following:

- circumstances indicating that the respondent has registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name 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 the respondent's documented out-of-pocket costs directly related to the domain name; or

- by using a domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to a 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 the website or location or of a product or service on the website or location.

The Complainant essentially claims that the Respondent was aware or must have been aware of its ENVOY mark when registering the Disputed Domain Name. According to the Complainant, the Disputed Domain Name is so obviously connected with the Complainant and its services that its very use by someone with no connection to the Complainant suggests opportunistic bad faith.

The Panel finds the following elements to be supporting the Complainant's case:

- the Complainant has rights in the mark ENVOY through its predecessor in interest since 1997-1998. Through the Panel's own research, it is apparent that the Complainant's predecessor in interest, US Airways, consistently used the ENVOY brand for its long-haul premium cabin offering, as confirmed by the related ENVOY CLASS and ENVOY LOUNGE trademarks;

- while the Envoy Air, Inc. corporate name was only introduced in 2014 and the <envoyair.com> domain name used by the Complainant was created in 2013, after the registration of the Disputed Domain Name, the underlying ENVOY mark was in active use since 1997. The combination of "envo" with "air" in the Disputed Domain Name, in light of the use of the ENVOY mark in the airline industry, creates a likelihood of confusion with the Complainant's mark. The addition of the term "air" reinforces rather than weakens the association with the Complainant's services.

The Panel further notes that the Disputed Domain Name resolves to a parking page with PPC links and is offered for sale for USD 7,826, which is clearly in excess of out-of-pocket costs. These circumstances are indicative of bad faith registration and use within the meaning of paragraph 4(b)(i) and (iv) of the Policy.

The Respondent, despite being given an opportunity to respond to the Complaint and to the Panel Order No. 1, has failed to come forward with any explanation for its registration of the Disputed Domain Name. In the absence of any such explanation, and in light of the circumstances described above, the Panel draws the inference that the Respondent registered the Disputed Domain Name with knowledge of the Complainant's ENVOY mark and with the intent to profit from the confusion thereby created.

Given the totality of the above circumstances, the Panel finds that, on the balance of probabilities, the Respondent registered and is using the Disputed Domain Name in bad faith. The Panel finds 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 <envoair.com> be transferred to the Complainant.

/Flip Jan Claude Petillion/
Flip Jan Claude Petillion
Sole Panelist
Date: March 30, 2026