

ADMINISTRATIVE PANEL DECISION

Avions de Transport Régional GIE v. Alison Ricketts
Case No. D2026-0278

1. The Parties

The Complainant is Avions de Transport Régional GIE, France, represented by DLA Piper Luxembourg, Luxembourg.

The Respondent is Alison Ricketts, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <atr-crafts.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 23, 2026. On January 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 23, 2026, 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 (Unknown registrant/ Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 26, 2026, 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 January 27, 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 the Respondent of the Complaint, and the proceedings commenced on January 30, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on February 20, 2026.

The Center appointed Mireille Buydens as the sole panelist in this matter on February 26, 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 a French Economic Interest Grouping (in French “groupeement d’intérêt économique”) founded in 1981 as a joint partnership between the French-based aviation conglomerate Airbus Group and the Italian multinational aerospace company Leonardo S.p.A. The Complainant is a leading manufacturer of regional aircraft, with their ATR-42 and ATR-72 being popular aircraft in the less than 90-seat market segment. The Complainant has sold over 1,700 aircraft to over 200 airlines in more than 100 countries. The Complainant has a global presence with offices in Toulouse, Miami, Singapore, Beijing, and Tokyo, as well as additional customer offices in Bangalore, Sao Paulo, and Johannesburg.

The Complainant owns various word and figurative trademarks for the ATR mark in multiple jurisdictions (hereafter “the ATR Trademark” or “the Trademark”). Relevant trademark registrations include, inter alia:

- the United Kingdom Trademark Registration No. UK00904956959 for ATR (word mark) in International Classes 12, 16, and 39, registered on May 21, 2008;
- the European Union Trademark Registration No. 004956959 for ATR (word mark) in International Classes 12, 16, and 39, registered on May 21, 2008; and
- the United States of America (“United States”) Trademark Registration No. 2440292 for ATR (word mark) in International Class 12 registered on April 3, 2001,

The Complainant also owns the domain names <atr-aircraft.com> and <atr-aircraft.fr>, which resolve to the Complainant’s official website.

The disputed domain name was registered on December 27, 2025. According to the Complaint, it resolved to a parking page comprising pay-per-click (“PPC”) links to a number of unrelated third-party websites, including advertising “Arts and Crafts”. At the date of this Decision, it resolves to an error page.

On January 26, 2025, the Complainant sent a cease-and-desist email to the Respondent, via the email provided by the Respondent to the Registrar, requesting that the disputed domain name be transferred to the Complainant. The Respondent didn’t reply.

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.

First, the Complainant contends that the disputed domain name is confusingly similar to the ATR Trademark as it contains the ATR Trademark in its entirety. The addition of a hyphen and the word “crafts” (which can also mean vessel or airplane) has a merely descriptive role and, given the nature of the goods and services offered by the Complainant, it contributes to further strengthen the likelihood of confusion. The Complainant also explains that the disputed domain name is very similar to its own domain names <atr-aircraft.com> and <atr-aircraft.fr>. Furthermore, the generic Top-Level Domain (“gTLD”) “.com” may be disregarded for the purposes of assessing confusing similarity.

Second, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. According to the Complainant, the Respondent does not hold any trademark rights in any country nor is it in any way associated with the word element “ATR” or with the aviation sector. The Complainant has not granted any license or authorization of any kind to the Respondent to use the ATR Trademark. The Respondent is not an authorized distributor of the Complainant and has never had a commercial relationship with the Complainant. Furthermore, the Respondent does not use the disputed domain name in connection with a bona fide offering of goods and services as it is passively hold. The Complainant contends that, taking into account the well-known character of the ATR Trademark and the foregoing circumstances, the Respondent was most likely aware of the existence of the ATR Trademark and of the Complainant.

The Complainant finally contends that the Respondent registered and uses the disputed domain name in bad faith. The Complainant contends that the ATR Trademark is well known in the aviation industry. An online search with the keyword “ATR” and “aircraft”, as well as a search on the usual social networks, show only results related to the Complainant. A search for domain names only shows five existing domain names containing the keyword “atr-aircraft”, all of them belonging to the Complainant. The only company in the world in the field of aviation that is named ATR is the Complainant, being an acronym of the Complainant's corporate name (in French) “Avions de Transport Régional” (meaning “Aircraft for Regional Transportation”). As a result, the Respondent has knowingly registered the disputed domain name with the sole purpose of trying to generate confusion on Internet users who are searching for the Complainant's goods and services and illegitimately occupying the disputed domain name with a view to obtain an unlawful economic benefit. The fact that the disputed domain name does not link to an active website is not an obstacle for a determination that there exists bad faith considering the “passive holding” doctrine.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy provides that the Complainant proves each of the following three elements in order to succeed in its Complaint:

- (i) the disputed 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 disputed domain name; and
- (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 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 for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the entirety of the ATR Trademark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the ATR Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The only difference between the ATR Trademark and the disputed domain name is the addition of the term “crafts”. Although the addition of this term may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Further, the gTLD “.com” is a standard registration requirement and is typically disregarded in the confusing similarity test.

Accordingly, the disputed domain name is confusingly similar to the ATR Trademark for the purposes of the Policy.

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 that 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.

According to the Complaint, which is not contradicted by the Respondent, the Respondent is not licensed by, nor affiliated with, the Complainant in any way. Based on the available records, the Panel finds that there is no evidence that the Respondent is commonly known by the disputed domain name. The website at the disputed domain name hosts PPC links, and there is no evidence that the Respondent has used it for a bona fide offering of goods or services or for any legitimate noncommercial purpose.

The Panel notes the Complainant’s argument that the added term “craft” is an English word which can notably mean “vessel” (like an aircraft or spacecraft). Further, the PPC links advertised on the website at the disputed domain name include links to “Arts and Crafts”; however, the Respondent has provided no explanation for the reproduction in the disputed domain name of the Complainant’s ATR Trademark – which is reputed in the airline industry – together with the term “crafts”. Noting also the fact that the disputed domain name is very similar to the Complainant’s own domain names (<atr-aircraft.com> and <atr-aircraft.fr>), the Panel finds, on balance, that the Respondent has targeted the Complainant’s Trademark and, by incorporating it, has likely intended to create a likelihood of confusion that the disputed domain name is associated with, or originates from, the Complainant. [WIPO Overview 3.1](#), section 2.5.1.

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.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panel notes that the Respondent has composed the disputed domain name by combining the Complainants' ATR Trademark, which is well-known in the aircraft industry, with a hyphen followed by the term "crafts". As noted above, the Panel takes the view that the Respondent intended to confuse Internet users into believing that the disputed domain name is affiliated with, or endorsed by, the Complainant. In the circumstances, and in the absence of any explanation from the Respondent for its choice of the disputed domain name, the Panel can only reasonably infer that the Respondent registered the disputed domain name in the knowledge of the Complainant's ATR Trademark and with the intention of taking unfair advantage of the goodwill attached to it by causing confusion among Internet users.

Besides, the Panel notes that a quick search for the term "ATR" online, would have revealed to the Respondent the existence of the Complainant and its ATR Trademark. As a result, the Panel finds that the Respondent was more likely than not aware of the Complainants' ATR Trademark at the time of the registration of the disputed domain name. [WIPO Overview 3.1](#), section 3.2.2.¹

The disputed domain name currently resolves to an error page. Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding.

[WIPO Overview 3.1](#), section 3.3. Although panelists will look at the totality of the circumstances in each case, factors that have been considered relevant in applying the passive holding doctrine include:

(i) the degree of distinctiveness or reputation of the complainant's mark; (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use; and (iii) the respondent's taking active steps to conceal its identity or use of false contact details (noted to be in breach of its registration agreement). In this respect, the Panel notes the distinctiveness of the ATR Trademark, especially in the aviation field, the composition of the disputed domain name (which includes the ATR Trademark in its entirety with the mere addition of a hyphen followed by the term "crafts"). The Panel also notes the failure of the Respondent to submit a response. The Panel finds that in the circumstances of this case, neither the current passive holding nor prior commercial links hosted on the website at the disputed domain name does not prevent a finding of bad faith under the Policy.

The Panel finds that the Complainants have 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 <atr-crafts.com> be transferred to the Complainant.

/Mireille Buydens/

Mireille Buydens

Sole Panelist

Date: March 6, 2026

¹ The Panel notes that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision ([WIPO Overview 3.1](#), section 4.8).