ADMINISTRATIVE PANEL DECISION

AirGSM Pte Ltd v. Muhammad Omar
Case No. D2026-0325

1. The Parties

The Complainant is AirGSM Pte Ltd, Singapore, represented by Lewis Silkin LLP, United Kingdom.

The Respondent is Muhammad Omar, Oman.

2. The Domain Name and Registrar

The disputed domain name <airalopartner.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 27, 2026. On January 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 27, 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 (Redacted) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 28, 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 amendment to the Complaint on February 2, 2026

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 February 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 24, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 25, 2026.

The Center appointed Vincent Denoyelle as the sole panelist in this matter on March 4, 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 provider of digital SIM (eSIM) cards, with international operations.

The Complainant owns several AIRALO trade mark registrations including the following:

- Singapore Trade Mark Registration AIRALO, No. 40201914330P, filed on July 3, 2019, and registered on December 19, 2019; and

- International Trade Mark Registration AIRALO, No. 1701049, registered on August 18, 2022, with protection extended to, inter alia, Australia, Brazil, China, Japan, Indonesia, Viet Nam, Canada, and the European Union.

The Complainant owns the domain name <airalo.com> which corresponds to its main website.

The disputed domain name was registered on February 21, 2025, and does not currently point to any active website. At the time of filing the Complaint, the disputed domain name resolved to a pay-per-click ("PPC") website.

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 highly similar to the Complainant's trade mark in that it replicates the Complainant's trade mark AIRALO in its entirety with the mere addition of the term "partner" which cannot serve to reduce such confusing similarity.

The Complainant states that, to its knowledge, the Respondent does not own any trade mark in the term "airalo". The Complainant also points to the passive use of the disputed domain name which could not, in the circumstances of the case, help to establish a legitimate interest in the disputed domain name.

Turning to bad faith, the Complainant asserts that its AIRALO trade mark is inherently distinctive and benefits from a strong international reputation whereby it is implausible that the Respondent would not have been aware of the Complainant and its trade mark when it registered the disputed domain name. The Complainant submits that the disputed domain name was registered to take unfair advantage of the Complainant's reputation by attracting Internet users through actual or intended confusion, including by creating the false impression that the disputed domain name is operated by, affiliated with, or authorised by the Complainant. The Complainant adds that the addition of the term "partner" to its AIRALO trade mark in the disputed domain name, reinforces the false association with the Complainant and poses a potential threat to the Complainant's business.

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 trade mark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The entirety of the Complainant's trade mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the AIRALO trade mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Although the addition of other terms here, "partner", 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 trade mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

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.

Here there is no indication that the Respondent is commonly known by the disputed domain name or has any rights corresponding to the disputed domain name.

In addition, the composition of the disputed domain name which reproduces the exact AIRALO trade mark with the mere addition of the term "partner", carries a risk of implied affiliation. 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.

In the present case, the Panel finds that the Respondent must have been aware of the Complainant and its AIRALO trade mark when it registered the disputed domain name given that (i) the AIRALO trade mark of the Complainant is reproduced in its entirety within the dispute domain name, (ii) the AIRALO trade marks of the Complainant predate the registration of the disputed domain name by several years, (iii), the Complainant has produced evidence of the visibility of the AIRALO trade mark online, including the substantial traffic generated by its website under the domain name <airalo.com> (for instance, 4.37 million visits in March 2025) and (iv) the choice of the Respondent to add to the AIRALO trade mark the term "partner" which acts to suggest an association with the Complainant.

Thus, the Panel finds that the disputed domain name was registered in bad faith.

Turning to the use of the disputed domain name, the disputed domain name resolved to a website featuring PPC links. The Panel finds that by using the disputed domain name, the Respondent intentionally attempted to attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion with the Complainant's trade mark.

The disputed domain name currently does not resolve to an active website. Panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. WIPO Overview 3.1, section 3.3.

Having reviewed the available record, the Panel notes the reputation and online visibility of the Complainant's trade mark as well as the composition of the disputed domain name and prior use of PPC links on the website, and finds that in the circumstances of this case the current passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 <airalopartner.com> be transferred to the Complainant.

/Vincent Denoyelle/
Vincent Denoyelle
Sole Panelist
Date: March 18, 2026