ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
AirGSM Pte Ltd v. Cameron Williams
Case No. D2026-0408

1. The Parties

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

The Respondent is Cameron Williams, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <airalo.help> is registered with NameSilo, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 1, 2026. On February 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 2, 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 (User #828e84f3 Privacy, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 3, 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 3, 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 10, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 2, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on March 6, 2026.

The Center appointed Taras Kyslyy as the sole panelist in this matter on March 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.

4. Factual Background

The Complainant's business was incorporated in 2019 and trades under the name "Airalo". The Complainant is a provider of digital SIM (eSIM) cards, providing its services to over 20 million customers in over 200 countries. The Complainant employs over 200 people, spread over 44 countries and 6 continents.

The Complainant owns a global portfolio of trademark rights for AIRALO and design mark 

including for instance International registration No. 1701049, registered on August 18, 2022, covering inter alia the United States.

The Complainant conducts its business primarily through its core website, found at "www.airalo.com", and its AIRALO-branded software applications. Its iOS app has received over 66,000 independent reviews (with an average score of 4.6 out of 5). Its Android app has been downloaded over 5 million times, has received over 80,000 reviews, with an average score of 4.5 out of 5. According to the website analytics website, Semrush, the Complainant's website attracted 3.92 million unique visits in January 2025, 3.78 million unique visits in February 2025 and 4.37 million unique visits in March 2025.

The disputed domain name was registered on January 18, 2026 and resolved to website prominently featuring the Complainants trademark, falsely pretending to be of the Complainant's and offering digital SIM cards for sale in the United Arab Emirates. At the time of the Decision in this case the disputed domain name does not resolve to any active 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 identical or confusingly similar to the Complainant's trademark. The disputed domain name incorporates the Complainant's distinctive trademark, which remains clearly recognizable within the disputed domain name. The generic Top-Level Domain ("gTLD") ".help" would, in the context of the Complainant's business, be readily understood by a customer as an official help or support portal associated with the Complainant. The Complainant submits that, rather than differentiating the disputed domain name, the presence of this descriptive gTLD ".help" serves to achieve the very opposite and reinforces the association with the Complainant's brand. In this instance, the ".help" gTLD, when combined with the Complainant's trademark, creates a domain name that a consumer would reasonably interpret as an official help resource provided by or affiliated with the Complainant.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent does not own any registered rights in AIRALO or AIRALO HELP marks. The term "Airalo" is a coined term. It is inherently distinctive and carries no descriptive connotations. The Complainant has not given consent for the Respondent to register domain names that incorporate its distinctive trademark. The disputed domain names resolve to website that pose as the Complainant's business and that appear to offer digital SIM cards for sale in the United Arab Emirates. The Respondent markets itself as the Complainant in a manner that deliberately misleads Internet users into believing that the digital SIM cards offered for sale through the disputed domain name originate from the Complainant. The website at the disputed domain name contains no information that would inform Internet users otherwise.

Furthermore, upon accessing the website at the disputed domain name, a user's computer appears to malfunction or freeze, with multiple clickable options failing to lead to any functional webpage. In these circumstances, the website not only deliberately misleads Internet users, but, by reason of its defective functionality and freezing behavior, also risks causing reputational harm to the Complainant.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. The Respondent should have been aware of the Complainant's business when registering the disputed domain name. It is implausible that the Respondent did not have the Complainant's business in mind when the disputed domain name was registered. A further risk arises from the fact that the disputed domain name is inherently capable of being used to create deceptive email addresses. Such email addresses would be highly likely to be mistaken for legitimate customer support or helpdesk communications from the Complainant. This creates a risk of fraud, including phishing, impersonation, and the solicitation of sensitive or confidential information from customers, suppliers, or other commercial counterparties. The Respondent registered the disputed domain name that is virtually identical to the Complainant's trademark and points the disputed domain name to the website that offers identical services to those supplied under the Complainant's trademark, in an attempt to deceive consumers into believing that they are conducting business with the Complainant.

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.

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.

Panel assessment of identity or confusing similarity involves comparing the (alpha-numeric) domain name and the textual components of the relevant mark. To the extent that design (or figurative/stylized) elements would be incapable of representation in domain names, these elements are largely disregarded for purposes of assessing identity or confusing similarity under the first element. Thus, the Panel disregards design element of the Complainant's trademark for the purposes of the confusing similarity check. WIPO Overview 3.1, section 1.10.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

The applicable gTLD in a domain name (e.g., ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. Thus, the Panel disregards gTLD ".help" for the purposes of the confusing similarity test. WIPO Overview 3.1, section 1.11.1.

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.

Panels have held that the use of a domain name for illegitimate activity here, claimed passing off, can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

The available evidence does not confirm that the Respondent is commonly known by the disputed domain name, which could demonstrate its rights or legitimate interests (see, e.g., *World Natural Bodybuilding Federation, Inc. v. Daniel Jones, TheDotCafe,* WIPO Case No. D2008-0642).

The Complainant did not license or otherwise agree for use of its prior registered trademark by the Respondent, thus no actual or contemplated bona fide or legitimate use of the disputed domain name could be reasonably claimed (see, e.g., *Sportswear Company S.P.A. v. Tang Hong,* WIPO Case No. D2014-1875).

Noting the high risk of implied affiliation between the disputed domain name and the identical widely known trademark of the Complainant, the Panel finds that there is no plausible fair use to which the disputed domain name could be put that would not have the effect of being somehow connected to the Complainant (see, e.g., *Instagram, LLC v. Super Privacy Service LTD c/o Dynadot / Zayed,* WIPO Case No. D2019-2897).

When the TLD is descriptive of or relates to goods or services (including their natural zone of expansion), a geographic region, or other term associated with the complainant, the respondent's selection of such TLD would tend to support a finding that the respondent obtained the domain name to take advantage of the complainant's mark, and as such that the respondent lacks rights or legitimate interests in the domain name. The Panel finds that gTLD ".help" in the disputed domain name relates to the services of the Complainant, normally involving support of customers, thus the customers may believe that the disputed domain name identical to the Complaint's trademark is registered by the Complainant specifically to provide help to its customers. This further confirms no legitimate interests of the Respondent in the disputed domain name. WIPO Overview 3.1, section 2.14.

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 notes that the Respondent registered the disputed domain name identical to the Complainant's widely known trademark, placed a website prominently featuring the Complainant's trademark and offered for sale services similar to the Complainant's. The Panel finds that the nature of the

disputed domain name and its use confirms the Respondent knew or should have known of the Complainant's prior trademark rights, which confirms the bad faith.

The mere registration of a domain name that is identical or confusingly similar to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. The Panel is convinced that the Complainant's trademark is well established through long and widespread use and the Complainant has acquired a significant reputation and level of goodwill in its trademark internationally. Thus, the Panel finds that the disputed domain name identical to the Complainant's trademark was registered in bad faith. WIPO Overview 3.1, section 3.1.4.

According to paragraph 4(b)(iv) of the Policy the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith: 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. In this case, the disputed domain name was resolving to a website featuring the Complainant's trademark and falsely pretended to be official Complainant's website to intentionally attract Internet users by creating likelihood of confusion with the Complainant's trademark as to the source of the website and its products. The Panel finds the above confirms the disputed domain name was registered and used in bad faith.

Panels have held that the use of a domain name for illegitimate activity here, claimed passing off, constitutes bad faith. WIPO Overview 3.1, section 3.4. 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 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 <airalo.help> be transferred to the Complainant.

/Taras Kyslyy/
Taras Kyslyy
Sole Panelist
Date: March 14, 2026