

ADMINISTRATIVE PANEL DECISION

Compagnie Générale des Etablissements Michelin v. Alpha Access Case No. D2026-1790

1. The Parties

The Complainant is Compagnie Générale des Etablissements Michelin, France, represented by Dreyfus & associés, France.

The Respondent is Alpha Access, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <michelinmanagementmethod.com> is registered with Squarespace Domains LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 27, 2026. On April 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 28, 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 (WY) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 29, 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 April 30, 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 May 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 24, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 26, 2026.

The Center appointed Juan Lapenne as the sole panelist in this matter on May 29, 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 leading tire company dedicated to providing suitable tires and also services and solutions to facilitate the mobility of people and goods.

The Complainant has been in business since 1889. It is headquartered in Clermont-Ferrand, France, and it is present in 171 countries with 69 tire manufacturing facilities and sales agencies in 17 countries, including 11 in the United States.

The Complainant is the owner of the following MICHELIN trademark registrations:

United States trademark registration No. 4126565 for MICHELIN, registered on April 10, 2012, in international classes 36, 37 and 39.

United States trademark registration No. 892045 for MICHELIN, registered on June 2, 1970, in international class 12.

International trademark registration No. 771031 for MICHELIN, registered on June 11, 2001, in international classes 5, 7, 8, 9, 10, 11, 12, 16, 17, 18, 20, 21, 24, 25, 39 and 42.

International trademark registration No. 1713161 for MICHELIN, registered on June 13, 2022, in international classes 6, 7, 9, 12, 16, 20, 35, 37, 39, 41 and 42.

The Complainant is the owner of the domain name < Michelin.com >, registered on December 1, 1993, which is used by the Complainant to promote its products and services.

The disputed domain name was registered on February 2, 2026, and currently does not point to any active website. However, according to the documents, printouts and statements submitted by the Complainant - which have not been contested by the Respondent - prior to the present proceeding the disputed domain name pointed to an active website presented as "THE MICHELIN METHOD™", in which a shared language of work comprising of a three-layer system to enhance collaboration among workers was promoted.

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.

The Complainant submits that the disputed domain name is confusingly similar to the well-known and famous trademark MICHELIN in which the Complainant has rights, as it reproduces the trademark in its entirety with the mere addition of generic and descriptive terms "management" and "method". Besides, the Complainant contends that the addition of the generic Top-Level Domain ("gTLD") ".com" is not to be taken into consideration when examining the identity or similarity between the Complainant's trademark and the disputed domain name.

Due to the generic and descriptive character of "management" and "method", these terms do not prevent a risk of confusion between the Complainant's trademark and the disputed domain name. Moreover, the Complainant contends that the disputed domain name gives the impression to Internet users that the

disputed domain name is connected to the Complainant since it refers to what appears to be an internal or proprietary methodology of the Complainant.

With reference to rights or legitimate interest in respect of the disputed domain name, the Complainant informs that the Respondent is not affiliated with the Complainant and has never been authorized by the Complainant to use the trademark MICHELIN.

In addition to the above and considering the initial use of the disputed domain name which pointed to a website presenting "THE MICHELIN METHOD™" as a three-tier system designed to create a common language, the Complainant submits that the Respondent was not providing a bona fide offering of goods or services. Rather the Respondent was intentionally seeking to impersonate the Complainant by creating the false impression of an official MICHELIN website and therefore confusing Internet users into thinking its website was owned by and/or affiliated with the Complainant.

In view of the above, the Complainant emphasizes that the Respondent was in no way making legitimate noncommercial use of the disputed domain name without intent for commercial gain.

The Complainant points out that the Respondent never answered the Complainant's cease-and-desist letter despite the Complainant's reminders and this fact confirms the Respondent has no rights or legitimate interests in the disputed domain name.

With reference to the circumstances evidencing bad faith registration, the Complainant indicates that MICHELIN registered trademarks predate the registration of the disputed domain name.

The Complainant argues that since MICHELIN trademark is well-known and famous throughout the world, it is unlikely that the Respondent was not aware of the Complainant's rights in the MICHELIN trademark. In this regard, the Complainant emphasized that a quick "MICHELIN" trademark search would have revealed to the Respondent the existence of the Complainant and its trademarks.

Regarding further bad faith use, the Complainant argues that the Respondent use of a domain name containing the well-known MICHELIN trademark that resolves to a website presenting "THE MICHELIN METHOD™" as a three-tier system designed to create a common language to enhance coordination and clarity and team execution, constitutes an authorized and misleading association with the Complainant, and may mislead Internet users into believing they are interacting with an official MICHELIN entity, and to unfairly capitalize on the Complainant's goodwill for commercial gain.

B. Respondent

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

6. Discussion and Findings

According to paragraph 15 (a) of the Rules: "A Panel shall decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable". Paragraph 4 (a) of the Policy directs that the Complainant must prove each of the following:

- (i) that the disputed domain name registered by the respondent is identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- (ii) that the respondent has no rights or legitimate interests in respect of the disputed domain name;
- (iii) that the disputed domain name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Panel finds that the Complainant has established rights over the trademark MICHELIN based on the trademark registrations cited under section 4 above.

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 disputed domain name is confusingly similar to the MICHELIN trademark, as it entirely incorporates the MICHELIN trademark with the mere addition of descriptive and generic terms ("management" and "method") and the gTLD ".com". Indeed, where the relevant trademark is recognizable within the disputed domain name, the addition of descriptive or meaningless terms does not prevent a finding of confusing similarity under the first element. [WIPO Overview 3.1](#), section 1.9.

The applicable Top-Level Domain (TLD) in a domain name is viewed as a standard registration requirement and as such is disregarded under the first element of the confusing similarity test. [WIPO Overview 3.1](#), section 1.11.

Therefore, the Panel finds that the Complainant has proven that the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has established rights according to paragraph 4 (a)(i) of the Policy.

B. Rights or Legitimate Interests

The Complainant must show that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent may establish a right or legitimate interest in the disputed domain name by demonstrating in accordance with paragraph 4(c) of the Policy any of the following:

"(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate non-commercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark as issue".

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.

The Panel finds that the Complainant has made a prima facie case and that the Respondent, by not submitting a Response, has failed to invoke any circumstance that could demonstrate, pursuant to paragraph 4(c) of the Policy, any rights or legitimate interests in the disputed domain name.

In the instant case, the Panel notes that the Complainant has no relation with the Respondent and that the Complainant did not authorize the Respondent to incorporate its MICHELIN trademark in the disputed domain name. The Respondent is not the Complainant's licensee or one of its agents.

There is no evidence to suggest that the Respondent is commonly known by the disputed domain name pursuant to paragraph 4(c)(ii) of the Policy.

As mentioned above, prior to the present proceeding the disputed domain name had been pointed to a website presented as the "THE MICHELIN METHOD™", which promoted a shared language of work consisting of a three-layer system designed to enhance collaboration within teams (screenshots on record provided by the Complainant). The website contained no disclaimer informing Internet users that it was unaffiliated with the Complainant, thus impersonating the Complainant by using the well-known trademark MICHELIN. In view of the above-described use, the Panel finds that the Respondent has not used the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use without intent for commercial gain to misleadingly divert consumers or to tarnish the Complainant's trademark.

Therefore, The Panel finds that the Complainant has proven that the Respondent has no rights or legitimate interests in the disputed domain name according to paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

Paragraph 4 (a)(iii) of the Policy requires that the Complainant prove that the disputed domain name was registered and used by the Respondent in bad faith.

As to the bad faith registration at the time of registration, February 2, 2026, the Panel notes that since the disputed domain name incorporates the well-known and famous MICHELIN trademark, the Respondent was or should have been aware of the Complainant's trademark at the time of registration of the disputed domain name. A quick online search of MICHELIN would have revealed the existence of the Complainant and its trademark rights. [WIPO Overview 3.1](#) section 3.2.2

The Panel also finds that the Respondent's use of the disputed domain name in connection with a website presented as the "THE MICHELIN METHOD™" for purposes of promoting a shared language of work and with no disclaimer informing Internet users that it was unaffiliated with the Complainant, amounts to bad faith under paragraph 4(b)(iv) of the Policy, since the Respondent intentionally attempted to attract Internet users to its website for commercial gain, by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation or endorsement of its website.

Therefore, 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 <michelinmanagementmethod.com> be transferred to the Complainant.

/Juan Lapenne/

Juan Lapenne

Sole Panelist

Date: June 5, 2026