

ADMINISTRATIVE PANEL DECISION

Outfront Media LLC v. Jeffrey Burton, Podcast Business News Network
Case No. D2026-2401

1. The Parties

Complainant is Outfront Media LLC, United States of America (“United States”), represented by Jones Day, United States.

Respondent is Jeffrey Burton, Podcast Business News Network, United States.

2. The Domain Name and Registrar

The disputed domain name <outfrontmedia.press> (the “Domain Name”) is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 3, 2026. On June 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On June 5, 2026, the Registrar transmitted by email to the Center its verification response, disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email to Complainant on June 8, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on June 11, 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 Respondent of the Complaint, and the proceedings commenced on June 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on July 3, 2026.

The Center appointed Robert A. Badgley as the sole panelist in this matter on July 10, 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

Complainant alleges:

“Outfront leverages the power of technology, location, and creativity to connect brands with consumers outside of their homes through one of the largest and most diverse collections of billboard, transit, and mobile assets in North America.” [...]

“Among numerous intellectual property rights, Outfront owns a portfolio of registered trademarks, including OUTFRONT, OUTFRONT MEDIA, OUTFRONT/, [a stylized mark OUTFRONT/], and OUTFRONTX (collectively, the ‘Outfront Marks’). The Outfront Marks are used in connection with a variety of advertising services, including, but not limited to, advertising services featuring audio and visual content distributed via billboards, digital billboards, digital posters, and digital outdoor advertising displays, as well as other marketing and promotional services.”

Complainant’s United States registered trademarks include: OUTFRONT, Reg. No. 5,834,907, registered on August 13, 2019; OUTFRONT, Reg. No. 8,047,232, registered on December 2, 2025; and OUTFRONT MEDIA, Reg. No. 4,909,495, registered on March 1, 2016.

According to Complainant:

“Since at least as early as October 2014, Outfront has prominently and extensively used, advertised, and promoted its out-of-home advertising and related services using the Outfront Marks, including on its website, social media pages, and marketing materials.”

Complainant owns the domain name <outfront.com> and uses that domain name to host its commercial website and feature its services.

The Domain Name was registered on September 8, 2025. The Domain Name resolves to a website identifying a business called “OutFront Media” and purporting to offer “Creative Advertising Solutions for Brands.” The website invites visitors to sign up for these purported services and to “get an estimate.”

Complainant’s counsel sent the Registrar a letter on November 6, 2025 and some follow-up correspondence, but allegedly received no response.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

B. Respondent

Respondent did not reply to Complainant’s contentions.

6. Discussion and Findings

Paragraph 4(a) of the Policy lists the three elements which Complainant must satisfy with respect to the Domain Name:

- (i) the Domain Name is identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (ii) Respondent has no rights or legitimate interests in respect of the Domain Name; and
- (iii) the Domain Name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Panel concludes that Complainant holds rights in the marks OUTFRONT and OUTFRONT MEDIA through registration and use demonstrated in the record. The Panel also concludes that the Domain Name is identical to the latter mark.

Complainant has established Policy paragraph 4(a)(i).

B. Rights or Legitimate Interests

Pursuant to paragraph 4(c) of the Policy, Respondent may establish its rights or legitimate interests in the Domain Name, among other circumstances, by showing any of the following elements:

- (i) before any notice to you [Respondent] 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 [Respondent] (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 [Respondent] are making a legitimate noncommercial or fair use of the Domain Name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Panel concludes that Respondent lacks rights or legitimate interests in respect of the Domain Name. Respondent has not come forward in these proceedings to articulate any possible bona fide interest in the Domain Name.

The Domain Name resolves to a commercial website which identifies a business calling itself "OutFront Media" and purports to offer services largely identical to Complainant's trademarked services. Because "out front" does not have any obvious connection with advertising services, the Panel cannot chalk up Respondent's selection of this Domain Name to coincidence. Rather, the Panel concludes on this undisputed record, Respondent more likely than not had Complainant's mark in mind when registering the Domain Name, and has sought to impersonate Complainant for commercial gain. Such conduct plainly does not invest Respondent with a legitimate interest vis-à-vis the Domain Name.

The Panel concludes that Complainant has established Policy paragraph 4(a)(ii).

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy provides that the following circumstances, "in particular but without limitation," are evidence of the registration and use of the Domain Name in "bad faith":

- (i) circumstances indicating that Respondent has registered or has acquired the Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Domain Name registration to Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the Domain Name; or

- (ii) that Respondent has registered the Domain Name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that Respondent has engaged in a pattern of such conduct; or
- (iii) that Respondent has registered the Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) that by using the Domain Name, Respondent has intentionally attempted to attract, for commercial gain, Internet users to Respondent's website or other online location, by creating a likelihood of confusion with Complainant's mark as to the source, sponsorship, affiliation, or endorsement of Respondent's website or location or of a product or service on Respondent's website or location.

The Panel concludes that Respondent has registered and used the Domain Name in bad faith. The Panel incorporates its discussion above in the "Rights or Legitimate Interests" section, and finds bad faith registration and use within the meaning of the above-quoted Policy paragraph 4(b)(iv).

Complainant has established Policy paragraph 4(a)(iii).

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 Domain Name <outfrontmedia.press> be transferred to Complainant.

/Robert A. Badgley/

Robert A. Badgley

Sole Panelist

Date: July 15, 2026