ADMINISTRATIVE PANEL DECISION

Compagnie Générale des Etablissements Michelin v. Bobby Hall
Case No. D2026-3110

1. The Parties

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

The Respondent is Bobby Hall, United States of America (the “United States”).

2. The Domain Name and Registrar

The disputed domain name <bfgoodrichgarage.shop> is registered with Dynadot Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 15, 2026. On July 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 17, 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 (Dynadot Privacy Service, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 21, 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 July 22, 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 July 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 16, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 26, 2026.

The Center appointed Levan Nanobashvili as the sole panelist in this matter on September 1, 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 world-leading tire company present in 170 countries, employing over 125,000 people worldwide, and operating 123 production sites in 26 countries. The Complainant is one of the top-selling tire brands globally, and BFGOODRICH is one of the tire brands in its portfolio.

The Complainant owns numerous registrations worldwide for BFGOODRICH, including the following:

1) United States Trademark BFGOODRICH (stylized), registration No. 1087694, registered on March 21, 1978, duly renewed, in International Class 12;

2) International Trademark BFGOODRICH (figurative), registration No. 1662353, registered on December 30, 2021, in International Classes 3, 6, 7, 8, 9, 11, 12, 14, 16, 18, 20, 21, 22, 24, 25, 27, and 28, designating multiple jurisdictions; and

3) French Trademark BFGOODRICH (word), registration No. 3447866, registered on August 29, 2006, duly renewed, in International Class 12.

The Complainant holds the domain name <bfgoodrich.com>.

The Respondent reportedly resides in the United States.

The disputed domain name was registered on April 24, 2026. At the time the Complaint was filed, the disputed domain name resolved to an active website offering products for sale under the BFGOODRICH mark. As of the date of this Decision, the disputed domain name resolves to an inactive webpage.

The Complainant sent a cease-and-desist letter to the Respondent through the Registrar on May 21, 2026, followed by several reminders. The Respondent did not 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.

Notably, the Complainant contends that:

(i) the Complainant's BFGOODRICH mark enjoys a worldwide reputation;

(ii) the disputed domain name wholly incorporates the BFGOODRICH mark. The addition of the word "garage" reinforces the association with the Complainant, as this word is directly connected with the Complainant's business;

(iii) the disputed domain name creates the confusing impression that it is affiliated with, endorsed by, or otherwise connected to the Complainant;

(iv) the Complainant's registration and use of the BFGOODRICH mark significantly predates the registration of the disputed domain name;

(v) it is implausible that the Respondent was unaware of the Complainant and its mark when registering the disputed domain name;

(vi) a simple search for the BFGOODRICH mark would have immediately revealed to the Respondent the existence of the Complainant and its mark. The Respondent's failure to make routine inquiries reinforces a finding of bad faith registration; and

(vii) the Respondent's use of the disputed domain name demonstrates an intent to take unfair advantage of, and commercially benefit from, the reputation and goodwill associated with the BFGOODRICH mark.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant carries the burden of proving that:

(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 has been registered and is being used in bad faith.

The Respondent's default in the case at hand does not automatically result in a decision in favor of the Complainant. However, paragraph 5(f) of the Rules provides that if the Respondent does not submit a Response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the Complaint.

Further, according to paragraph 14(b) of the Rules, the Panel shall draw such inferences from the Respondent's failure to submit a Response as it considers appropriate.

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.

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

Although the addition of other terms, in the present case a word "garage", may bear on assessment of the second and third elements, the Panel finds the addition of this word does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

The addition of the generic Top-Level Domain ".shop" is a standard registration requirement and, as such, is disregarded under the first element 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.

The Respondent provided no evidence that it has been commonly known by the disputed domain name, or has made a legitimate noncommercial use thereof. The Respondent has not rebutted the Complainant's contention that it has not authorized the Respondent to use the Complainant's mark, or that there is no relationship between them that could justify the Respondent's use of the Complainant's mark in the disputed domain name.

The Panel finds that the composition of the disputed domain name, which combines the Complainant's mark and the word "garage", carries a risk of implied affiliation. Such a combination is likely to lead Internet users to believe that the domain name is owned, sponsored, or endorsed by 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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. WIPO Overview 3.1, section 3.2.1.

In the present case, the Panel finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark, pursuant to paragraph 4(b)(iv) of the Policy.

At the time of the Decision, the disputed domain name does not resolve to an active page. However, 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. WIPO Overview 3.1, section 3.3. Having reviewed the available record, the Panel notes the reputation of the Complainant's trademark, the composition and prior use of the disputed domain name 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 notes that the widespread reputation of the Complainant's BFGOODRICH mark was recognized in previous UDRP decisions. See *Compagnie Générale des Etablissements Michelin v. Joseph Lee*, WIPO Case No. D2025-2257: "the disputed domain names include the Complainant's well-known trademark in its entirety"; *Compagnie Générale des Etablissements Michelin v. Shuitu Chen,* WIPO Case No. D2016-1924: "the widely known reputation of the Complainant's mark is evident from several UDRP decisions"; and *Compagnie Générale des Etablissements Michelin v. Oncu, Ibrahim Gonullu,* WIPO Case No. D2014-1240: "Complainant having a well-known trademark".

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names incorporating the mark plus a descriptive term) to a well-known trademark can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4.

In the present case, the disputed domain name incorporates the Complainant's widely known BFGOODRICH mark in its entirety. Given that the mark predates the disputed domain name's registration, and that the added term "garage" relates to the Complainant's business, the Panel finds it improbable that the Respondent was unaware of the Complainant. Consequently, the Panel concludes that the Respondent knew of the Complainant's trademark rights and intentionally registered the disputed domain name to target the Complainant.

In the present case, the composition of the disputed domain name, with the mere addition of the word "garage", suggests that the Respondent was actually aware of, and intended to target the Complainant's mark.

The Respondent failed to reply to the cease-and-desist letter and did not explain or justify the use of the Complainant's mark in the disputed domain name. UDRP panels have consistently held that the failure to respond to a cease-and-desist letter may be a factor in establishing bad faith registration and use of a domain name. See *Carrefour v. Jan Everno, The Management Group II*, WIPO Case No. D2017-0586, *Remy Cointreau Luxembourg S.A. v. Deividas Samulionis, UAB "Sentosa"*, WIPO Case No. D2016-2232, and *Encyclopaedia Britannica, Inc. v. John Zuccarini and The Cupcake Patrol a/ka Country Walk a/k/a Cupcake Party,* WIPO Case No. D2000-0330.

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 <bfgoodrichgarage.shop> be transferred to the Complainant.

/Levan Nanobashvili/
Levan Nanobashvili
Sole Panelist
Date: September 11, 2026