

ADMINISTRATIVE PANEL DECISION

Songscription Inc. v. Erika Ross

Case No. D2026-3166

1. The Parties

The Complainant is Songscription Inc., United States of America (the “United States”), represented by Granderson Des Rochers LLP, United States.

The Respondent is Erika Ross, France.

2. The Domain Name and Registrar

The disputed domain name <songscription.net> (the “Disputed Domain Name”) 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 17, 2026. On July 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On July 21, 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 for Privacy, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 22, 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 27, 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 August 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 23, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 24, 2026.

The Center appointed Gabriela Kennedy as the sole panelist in this matter on August 26, 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 was founded in 2024 and operates an innovative AI-powered platform available at <songscription.ai> that converts audio into professionally transcribed music scores.

The Complainant owns the United States Trademark Registration No. 8,059,759 for SONGSCRIPTION in Class 42 registered on December 9, 2025 (the “Complainant’s Trademark”).

The Disputed Domain Name was registered on June 10, 2026, around half a year after the Complainant registered the Complainant’s Trademark. At the time of the filing of the Complaint, the Disputed Domain Name resolved to an active website purporting to offer music transcription services similar to that of the Complainant and reproducing the Complainant’s own business history and biographical facts. The bottom of the website contains a “© 2026 Songscription Inc.” copyright notice. According to the Complainant, every outbound link on the website directed visitors to the Apple App Store listing for SongGo, a competing third-party AI music generation application. At the time of rendering of this Decision, the Disputed Domain Name resolved to a similar website as described by the Complainant. However, the outbound links in the website redirected Internet users to another website (“www.helperapp.onelink.me/Jfzl/2oma5yvf”) showing a blank page with the message “Application ID not found” (the “Respondent’s 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:

(a) the Disputed Domain Name is identical to the Complainant’s Trademark. The Disputed Domain Name incorporates the Complainant’s Trademark in its entirety, without alteration, addition, or deletion of any letters. The only difference between the Disputed Domain Name and the Complainant’s own domain name (<songscription.ai>) is the generic Top-Level Domain (“.net” versus “.ai”) which should be disregarded for purposes of the assessing confusing similarity of the Disputed Domain Name.

(b) the Respondent has no rights or legitimate interests in the Disputed Domain Name. The Complainant has not licensed, authorized, or otherwise permitted the Respondent to use the Complainant’s Trademark in any manner, including as a domain name. The Respondent is not commonly known by the Disputed Domain Name, nor by the name “Songscription”, whether as an individual, business, or other organization. The Respondent’s use of the Disputed Domain Name does not constitute a bona fide offering of goods or services as the Respondent has constructed a website that impersonates the Complainant by reproducing the Complainant’s own business history and press coverage, for the apparent sole purpose of diverting visitors to the App Store listing for a directly competing product, SongGo.

(c) the Respondent has registered the Disputed Domain Name and is using it in bad faith. The wholesale reproduction of the specific, non-generic facts about the Complainant’s business demonstrates that the Respondent had actual knowledge of the Complainant and its mark at the time of registration, and registered the Disputed Domain Name specifically to trade on the Complainant’s identity. As the click through links on the Respondent’s Website all redirect visitors to the App Store listing for SongGo, an AI music generation

application, it is evident that the Respondent is using the Disputed Domain Name to divert traffic to a direct competitor of the Complainant. Furthermore, the Respondent has seemingly provided false contact information when registering the Disputed Domain Name.

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 is required to prove each of the following three elements:

- (i) the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (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 by the Respondent in bad faith.

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 Complainant's Trademark is reproduced within the Disputed Domain Name. Furthermore, the generic Top-Level Domain in this case, ".net", may be disregarded for the purposes of assessing confusing similarity under the first element. Accordingly, the Disputed Domain Name is identical to the Complainant's Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

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.

In the present case, the Respondent did not submit a Response. The fact that the Respondent did not submit a Response does not automatically result in a decision in favor of the Complainant. However, the Respondent's failure to file a Response may result in the Panel drawing appropriate inferences from such default. The Panel may also accept all reasonable and supported allegations and inferences flowing from

the Complaint as true (see *Entertainment Shopping AG v. Nischal Soni, Sonik Technologies*, WIPO Case No. [D2009-1437](#); and *Charles Jourdan Holding AG v. AAIM*, WIPO Case No. [D2000-0403](#)).

The Panel notes that there is no evidence on the available record to show that the Respondent has trademark rights corresponding to the Disputed Domain Name, or that the Respondent has become commonly known by the Disputed Domain Name. The Panel further notes that the Complainant has provided no license or authorization of any kind to the Respondent to use the Complainant's Trademark or to apply for or use any domain name incorporating the Complainant's Trademark. The use of the Complainant's Trademark in the Disputed Domain Name and on the Respondent's Website carries a high risk of implied affiliation and effectively impersonates or suggests sponsorship or endorsement by the Complainant. See section 2.5.1 of the [WIPO Overview 3.1](#).

There is also no evidence to suggest that the Respondent's use of the Disputed Domain Name is in connection with a bona fide offering of goods or services or to be regarded as legitimate noncommercial or fair use. The Respondent has used the Respondent's Website to impersonate or pass itself off as the Complainant by featuring the Complainant's Trademark, displaying content related to the Complainant's business, placing a copyright notice in the Complainant's name at the bottom of the page, and including click through links redirecting Internet users to third-party AI-powered music service similar to or in competition with the product offered by the Complainant.

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 such as passing off can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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 notes that it is difficult to conceive of any plausible use of the Disputed Domain Name by the unaffiliated Respondent that would amount to good faith use, given that the Disputed Domain Name incorporates the Complainant's Trademark in its entirety, and the Respondent's Website displays the Complainant's Trademark and distinct facts relating to the Complainant's business, and provides links redirecting Internet users to a third-party AI music application. The Respondent has registered and used the Disputed Domain Name to mislead and divert Internet users to the Respondent's Website for commercial gain by creating a likelihood of confusion with the Complainant's Trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's Website. Further, the Respondent failed to respond to the Complainant's contentions and has provided no evidence of any actual or contemplated good faith use of the Disputed Domain Name.

The Respondent must have been aware of the Complainant and the Complainant's Trademark when registering and using the Disputed Domain Name as the Respondent's Website displays specific facts relating to the Complainant's business as well as a copyright notice in the Complainant's name. Moreover, the Respondent's Website features the Complainant's Trademark to create an impression that it is a website authorized or endorsed by the Complainant when it is not. 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 <songscription.net> be transferred to the Complainant.

/Gabriela Kennedy/

Gabriela Kennedy

Sole Panelist

Date: September 9, 2026