

ADMINISTRATIVE PANEL DECISION

Temple University-Of The Commonwealth System of Higher Education v.
Domain Administrator
Case No. D2026-3206

1. The Parties

The Complainant is Temple University-Of The Commonwealth System of Higher Education, United States of America, represented by 101domain.com, United States of America.

The Respondent is Domain Administrator, Hong Kong, China.

2. The Domain Name and Registrar

The disputed domain name <templeuniversity.com> is registered with Above.com Pty Ltd. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 21, 2026. On July 22, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 24, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 24, 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 29, 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 29, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 18, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 20, 2026.

The Center appointed Nayiri Boghossian 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 is a university established in 1884. The Complainant owns numerous trademark registrations for TEMPLE UNIVERSITY such as:

- United States of America trademark registration No. 1538142, registered on May 9, 1989;
- United States of America trademark registration No. 3234742, registered on April 24, 2007.

The disputed domain name was registered on January 7, 2000. The website at the disputed domain name displays a security threat warning. An MX server has been activated in connection with the disputed domain name.

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 confusingly similar to the Complainant's trademark. The disputed domain name reproduces the Complainant's trademark in its entirety.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not licensed, or authorized by the Complainant to use the Complainant's trademark.

The Respondent is not commonly known by the disputed domain name. The Respondent is not making a legitimate noncommercial or fair use of the disputed domain name. There is no evidence of use of, or demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. By creating active MX records connected to a domain comprised entirely of the Complainant's trademark, the Respondent clearly registered the disputed domain name with the Complainant's university in mind. The disputed domain name is being used to create confusion with the Complainant's trademark and is preventing the Complainant from reflecting their trademarks.

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.

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 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.

Furthermore, evidence shows that the disputed domain name was reported for abusive DNS activity and as a flagged website (See *Qatar Airways Group (Q.C.S.C.) v. Milen Radumilo*, WIPO Case No. [D2023-2217](#)). Also, an MX server is associated with the disputed domain name, which may reflect an intent to send fraudulent emails (See *FragranceX.com Inc. v. Quan Zhongjun, Juanita Co.*, WIPO Case No. [D2025-3606](#)).

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 disputed domain name incorporates the Complainant's trademark in its entirety and that the disputed domain name was created more than a decade after the registration of the Complainant's trademark. Therefore, the Panel finds that the Respondent knew of the Complainant at the time of registration of the disputed domain name. Additionally, an email service is

attached to the disputed domain name and the disputed domain name was reported for abusive DNS activity and as a flagged website.

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.

The Panel notes that an active MX server creates an ongoing threat to the Complainant, since the disputed domain name may be used by the Respondent to mislead potential recipients of emails into the belief that such emails were sent by the Complainant. (See *FragranceX.com Inc. v. Quan Zhongjun, Juanita Co.*, WIPO Case No. [D2025-3606](#) and *VKR Holding A/S v. Caner Ates*, WIPO Case No. [D2026-0298](#)). The Panel also takes note of the absence of response by the Respondent, which can be a further indication of bad faith (See *Qatar Airways Group (Q.C.S.C.) v. Milen Radumilo*, WIPO Case No. [D2023-2217](#)). Also, the disputed domain name was reported for abusive DNS activity, which is a further indication of bad faith.

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 <templeuniversity.com> be transferred to the Complainant.

/Nayiri Boghossian/

Nayiri Boghossian

Sole Panelist

Date: August 27, 2026