

ADMINISTRATIVE PANEL DECISION

American Airlines, Inc. v. Domain Administrator; Karl Schnurch, EdenMedia
Case No. D2026-3732

1. The Parties

The Complainant is American Airlines, Inc., United States of America (“United States”), represented by Greenberg Traurig, LLP, United States.

The Respondents are Domain Administrator, China and Karl Schnurch, EdenMedia, Seychelles.

2. The Domain Names and Registrars

The disputed domain name <americanairirlines.com> is registered with Key-Systems GmbH (the “Registrar”).

The disputed domain name <americanairirlines.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 August 20, 2026. On August 20, 2026, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On August 21 and 24, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (On behalf of americanairirlines.com OWNER c/o whoisproxy.com and not provided Hong Kong, HK) and contact information in the Complaint.

The Center sent an email communication to the Complainant on August 25, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on August 26, 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 Respondents of the Complaint, and the proceedings commenced on August 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 16, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on September 23, 2026.

The Center appointed Vincent Denoyelle as the sole panelist in this matter on October 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 was established more than 90 years ago and is one of the largest air carriers in the world.

The Complainant is the owner of numerous trade mark registrations for AMERICAN AIRLINES worldwide, including:

- United States trade mark AMERICAN AIRLINES, with registration number 514,294 of August 23, 1949 for services in class 39; and
- European Union trade mark AMERICAN AIRLINES, with registration number 000153726 of March 29, 1999 for goods and services in classes 14, 16, 18, 25, 28, 34 and 39.

The Complainant owns and operates the domain names <aa.com> and <americanairlines.com>, which redirects to <aa.com> where the Complainant's primary website is hosted, in addition to numerous other domain names reflecting its trademark "American Airlines".

Both disputed domain names were registered on October 9, 2003.

The disputed domain name <americanairlines.com> redirects to a parking page under the domain name <curiouspatch.com> with pay-per click ("PPC") advertising links that redirect to websites in competition with the Complainant.

The disputed domain name <americanairlines.com> directs to a parking page with PPC advertising links that redirect to websites in competition with the Complainant.

Both disputed domain names have active MX (mail exchange) records.

Both disputed domain names are offered for sale on domain name auction websites.

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 names.

Notably, the Complainant contends that the disputed domain names are confusingly similar to the Complainant's AMERICAN AIRLINES trade mark, which it incorporates almost identically save for the addition of the letter "i" in the first disputed domain name between "air" and "lines" and the addition of the letter "r" in the second disputed domain name between the "a" and "ir" of the word "air".

Further, the Complainant alleges that the Respondents have no rights or legitimate interests in respect of the disputed domain names because the Respondents are not commonly known by the disputed domain names and have not used or prepared to use the disputed domain names in connection with a bona fide offering of goods or services, and have not been authorized, licensed, or otherwise permitted by the Complainant to register and/or use the disputed domain names.

The Complainant also contends that the Respondents have registered the disputed domain names in bad faith in an effort to target the Complainant, long after the Complainant established its rights in its AMERICAN AIRLINES trade mark. Turning to use of the disputed domain names in bad faith, the Complainant highlights that the Respondents use the disputed domain names to redirect Internet traffic to competitive websites garnering PPC or affiliate advertising revenue for the Respondent's commercial gain. Further, the Complainant points to the fact that both disputed domain names are offered for sale for amounts exceeding out-of-pocket costs directly related to the respective disputed domain names. Also, the Complainant contends that the disputed domain names have active MX (mail exchange) records with the potential for additional bad faith use of the disputed domain names to engage in fraudulent email or phishing communications.

B. Respondent

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

6. Discussion and Findings

6.1. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.11.2.

As regards common control, the Panel notes that there are many similarities between the disputed domain names including the fact that the disputed domain names:

- were registered on the exact same day;
- are used in a highly similar manner, to direct or redirect to websites with targeted PPC advertising links;
- present a very similar composition with the addition of one letter in the second word of the AMERICAN AIRLINES trade mark of the Complainant; and
- are offered for sale on third party websites.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “the Respondent”) in a single proceeding.

6.2. Substantive Issues

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 trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the AMERICAN AIRLINES trade mark is recognizable within the disputed domain names as the disputed domain names only differ from the AMERICAN AIRLINES trade mark by the addition of one letter in the second word of the AMERICAN AIRLINES trade mark of the Complainant. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), sections 1.7 and 1.9.

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 names. 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 names such as those enumerated in the Policy or otherwise.

Based on the evidence available and in the absence of a response from the Respondent, the Panel finds that the Respondent’s sole purpose in registering and using the disputed domain names is to free ride off the Complainant’s trade mark and associated goodwill by generating revenue through PPC advertising links and seeking to sell the disputed domain names. This type of use constitutes neither use of the disputed domain names with a bona fide offering nor legitimate noncommercial or fair use of the disputed domain names.

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 finds that the Respondent must have been aware of the Complainant and its trade mark at the time of registering the disputed domain names given (i) the fact that the disputed domain names are almost identical to the AMERICAN AIRLINES trade mark of the Complainant save for the addition of one letter in the word “airlines”, (ii) the substantial renown and longstanding use of the AMERICAN AIRLINES trade mark of the Complainant which predate the registration of the disputed domain names by several decades, and (iii) the fact that a search in Google for both disputed domain names only trigger results relating to the Complainant.

Turning to use of the disputed domain names in bad faith, based on the evidence available and in the absence of a response from the Respondent, the Panel finds that the Respondent’s sole purpose in registering and using the disputed domain names is to free ride off the Complainant’s trade mark and associated goodwill and that the use of the disputed domain names fall within the meaning of paragraphs 4(b)(i) and 4(b)(iv) of 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 names <americanairirlines.com> and <americanairlines.com> be transferred to the Complainant.

/Vincent Denoyelle/

Vincent Denoyelle

Sole Panelist

Date: October 14, 2026