ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
TELEVISION FRANCAISE 1 v. Palmer Erik
Case No. DCO2026-0079

1. The Parties

The Complainant is Television Française 1, France, represented by In Concreto, France.

The Respondent is Palmer Erik, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <tf1-fr.co> is registered with Network Solutions, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 29, 2026. On October 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 1, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on October 2, 2026, providing the registrant and contact information disclosed by the Registrar.

The Center verified that 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 the Respondent of the Complaint, and the proceedings commenced on October 5, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 25, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 26, 2026.

The Center appointed Ugur G. Yalçiner as the sole panelist in this matter on October 28, 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, Television Française 1, is a French company founded in 1974 and operating in the television broadcasting, streaming, and audiovisual production sectors. It is part of TF1 Group, a leading French media group with an international presence, employing more than 3,000 people across 12 countries.

The Complainant is the owner of numerous trademark registrations incorporating the term TF1, some of which are listed below:

- French trademark registration TF1 with registration No. 1290436, registered on November 22, 1984, in classes 1 through 42;

- International trademark registration TF1 with registration No. 556537, registered on July 30, 1990, in classes 9, 16, 25, 28, 35, 38, and 41;

- French trademark registration TF1 ONLINE with registration No. 99812962, registered on September 20, 1999, in classes 5, 9, 16, 25, 28, 35, 38, 40, 41, 42, and 45;

- International trademark registration TF1 DIGITAL with registration No. 761279, registered on November 27, 2000, in classes 9, 16, 35, 38, 41, and 42;

- International trademark registration TF1 INFO with registration No. 1676495, registered on April 22, 2022, in classes 9, 35, 38, 41, and 42.

The Complainant further owns numerous domain names incorporating the TF1 mark, including <tf1.fr>, registered on December 3, 1995, and <tf1info-france.com>, registered on June 10, 2025.

The disputed domain name was registered on September 11, 2026, and does not currently resolve to an active website. However, according to the Complaint, it previously resolved to a Pay-Per-Click ("PPC") parking page displaying links related to the Complainant's field of activity, particularly television broadcasting and streaming services.

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. The Complaint includes the following contentions:

(i) Identical or Confusingly Similar

The Complainant contends that the disputed domain name is confusingly similar to its well-known TF1 trademarks, in which it holds prior rights through numerous trademark registrations worldwide, as it incorporates the TF1 trademark in its entirety with the addition of the geographical term "fr", referring to France, and the country code Top-Level Domain ("ccTLD") ".co". According to the Complainant, the addition of "fr" increases the likelihood of confusion, given that France is its main territory of activity.

The Complainant further argues that the disputed domain name closely resembles its domain name <tf1.fr> and refers to previous UDRP decisions involving similar domain names incorporating the TF1 trademark, maintaining that the disputed domain name is confusingly similar to its prior rights.

(ii) Rights or Legitimate Interests

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It has not licensed or authorized the Respondent to use its trademarks or domain names or to register a domain name incorporating its rights.

The Complainant further asserts that the Respondent appears to be located in the United States, while the disputed domain name includes the France ISO code, and that no relevant connection has been found between the Respondent's name and the disputed domain name.

The Complainant also states that the disputed domain name resolved to PPC links related to the TV field, which is directly linked to the Complainant's field of activity. According to the Complainant, the Respondent could not have been unaware of its trademarks and is neither making a bona fide offering of goods or services nor engaged in any legitimate non-commercial or fair use of the disputed domain name.

(iii) Registration and Use in Bad Faith

The Complainant contends that the disputed domain name was registered and is being used in bad faith, as it reproduces its TF1 trademark in its entirety with the addition of the France ISO code "fr", increasing its proximity to the Complainant's prior rights.

The Complainant asserts that its TF1 trademark has acquired a high reputation and fame in the media industry, particularly in France but also internationally, and that "TF1" is neither a descriptive term nor a commonly used expression. According to the Complainant, the Respondent could not have ignored the existence of its trademarks at the time of registration, as a simple Google search would have directed the Respondent to the Complainant's websites.

The Complainant further argues that the Respondent has used the disputed domain name through PPC links related to its field of activity, attracting Internet users for commercial gain by creating confusion as to an association with the Complainant. The Complainant asserts that such use does not constitute a bona fide offering of goods or services and is intended to take unfair advantage of its trademarks, mislead consumers, and divert them to the associated website. The Complainant also claims that such use may tarnish its brand and image.

Finally, the Complainant states that the address provided by the Respondent during registration corresponds to a community church and religious school (King's Christian School), unrelated to TF1, and appears to be false information intended to avoid identification. The Complainant therefore maintains that the Respondent registered and used the disputed domain name in bad faith to capitalize on its reputation and rights.

B. Respondent

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

6. Discussion and Findings

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three elements are present:

(i) the disputed domain name registered by the Respondent 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 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 for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1. The Panel is satisfied that the Complainant is the owner of the trademark TF1 registered in several jurisdictions.

The disputed domain name incorporates the Complainant's trademark TF1 in its entirety, together with a hyphen and the additional letters "fr", which corresponds to the country code for France. In this regard, the Panel considers that the mere addition of "-fr" does not prevent a finding of confusing similarity with the Complainant's trademark, as the Complainant's TF1 trademark remains recognizable within the disputed domain name (WIPO Overview 3.1, section 1.8).

It is an accepted principle that Top-Level Domains ("TLDs"), in this case ".co", are typically disregarded when assessing whether a domain name is identical or confusingly similar to a complainant's trademark. WIPO Overview 3.1, section 1.11.1.

In the light of the above, the Panel finds that the disputed domain name is confusingly similar to the Complainant's registered trademark and that the requirements in paragraph 4(a)(i) of the Policy are fulfilled.

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 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 Panel notes that there is no evidence in the record that the Respondent is commonly known by the disputed domain name or holds any relevant trademark rights. The Complainant has not licensed or otherwise authorized the Respondent to use its TF1 trademark. Furthermore, there is no evidence of the Respondent's demonstrable preparations to use the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services. Rather, according to the Complaint and Annex 12 thereto, the disputed domain name previously resolved to a PPC parking page displaying links related to the Complainant's field of activity, particularly television broadcasting and streaming services. The Panel finds that such use, which creates a misleading association with the Complainant and its trademark, does not constitute a bona fide offering of goods or services or otherwise confer rights or legitimate interests on the Respondent in the circumstances of this case.

As a result, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name, and the requirements of paragraph 4(a)(ii) of the Policy are therefore fulfilled by the Complainant.

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 is satisfied with the relevant evidence submitted by the Complainant showing that it owns trademark rights in TF1, which have been registered and used for many years prior to the registration of the disputed domain name.

The Panel notes that the evidence submitted by the Complainant supports a finding that the TF1 trademark is well known, particularly in the television broadcasting and media sector. The reputation of the Complainant's trademark has also been acknowledged in previous UDRP decisions, including *Television Francaise 1 v. Jean Michel, trafficlive* WIPO Case No. D2025-2567; *Télévision Française 1 v. Jean loup Le loup* WIPO Case No. D2025-4435; *Television Francaise 1 v. Gilmore Thompson* WIPO Case No. D2022-4442. Several UDRP panels have held that the mere registration of a domain name that is identical or confusingly similar to a famous or widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4.

The disputed domain name incorporates the TF1 trademark in its entirety together with the geographical abbreviation "fr", referring to France, where the Complainant principally operates. Furthermore, the disputed domain name previously resolved to a PPC parking page displaying links relating to television broadcasting and streaming services, directly connected to the Complainant's field of activity. Considering these circumstances as a whole, the Panel finds it unlikely that the Respondent registered the disputed domain name without knowledge of the Complainant and its TF1 trademark.

The Panel further considers that the use of the disputed domain name to display PPC links related to the Complainant's field of activity supports a finding that the Respondent intended to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the associated website, within the meaning of paragraph 4(b)(iv) of the Policy.

Having considered all the facts in this case, the Panel finds that the Complainant has sustained its burden of proof in showing that the disputed domain name was registered and used in bad faith.

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 <tf1-fr.co> be transferred to the Complainant.

/Ugur G. Yalçiner/
Ugur G. Yalçiner
Sole Panelist
Date: November 6, 2026