

GIGALAW'S

DOMAIN DISPUTE DIGEST

SECOND QUARTER, 2025

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FOREWORD

New Data This Quarter: Reverse Domain Name Hijacking

Starting with this issue, GigaLaw's Domain Dispute Digest is reporting on UDRP decisions involving Reverse Domain Name Hijacking ("RDNH"), [p. 8](#).

The UDRP Rules define RDNH as "using the Policy in bad faith to attempt to deprive a registered domain-name holder of a domain name." The Rules state that a panel "shall declare in its decision that the complaint was brought in bad faith and constitutes an abuse of the administrative proceeding" if "after considering the submissions the Panel finds that the complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or was brought primarily to harass the domain-name holder."

Although there are no express consequences for a complainant if a panel issues a finding of RDNH, many domain name registrants see it as a way to publicly shame or reprimand those who file inappropriate UDRP complaints, perhaps discouraging future improper complaints from being filed in the first place.

Indeed, as some of the decisions finding RDNH last quarter make clear, these complaints probably should not have been filed in the first place. For example, in a UDRP decision involving the domain name <ks.com> (WIPO Case No. D2025-0756), the panel wrote:

This is a compelling case for a finding that the Complaint was brought in bad faith and constitutes an abuse of the UDRP. This Complaint is replete with material omissions and outright lies, such as assuming the identity of nonexistent and defunct corporations, submitting a copy of the Respondent's (cancelled) trademark certificate, and claiming continuous use of a domain name, website, and social media site without proof that the

Complainant ever controlled them. Moreover, it appears that the Complainant fabricated a document to make a spurious case for bad faith against the Respondent. A valuable and apparently dormant domain name makes a tempting target, and it is lamentable that a legitimate registrant should be put to the burden of defending against such an abuse of the administrative proceeding.

And in another decision, for the domain name <watertimer.com> (WIPO Case No. D2025-1642), the panel wrote:

Complainant... knew or should have known that there was no evidence of the Respondent's bad faith directed towards the Complainant, making highly unlikely if not impossible that the Respondent had been targeting the Complainant. Finally, as it has been stated in previous decisions, a complainant is at risk of a RDNH declaration when its attempt to try and buy a domain name is not successful, and it tries to obtain it by using, or rather "abusing", the UDRP.

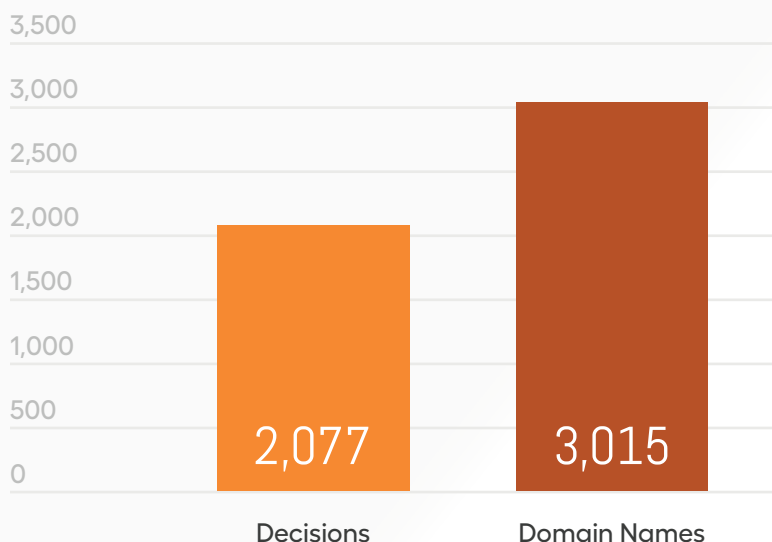
While cases like these are shocking, the data on RDNH makes clear that these types of bad faith disputes are incredibly uncommon. Across all UDRP service providers, panels in only 1.3 percent of decisions issued a finding of RDNH last quarter.

Doug Isenberg

Attorney and Founder of GigaLaw
Doug@Giga.Law



Number of UDRP Decisions and Domain Names



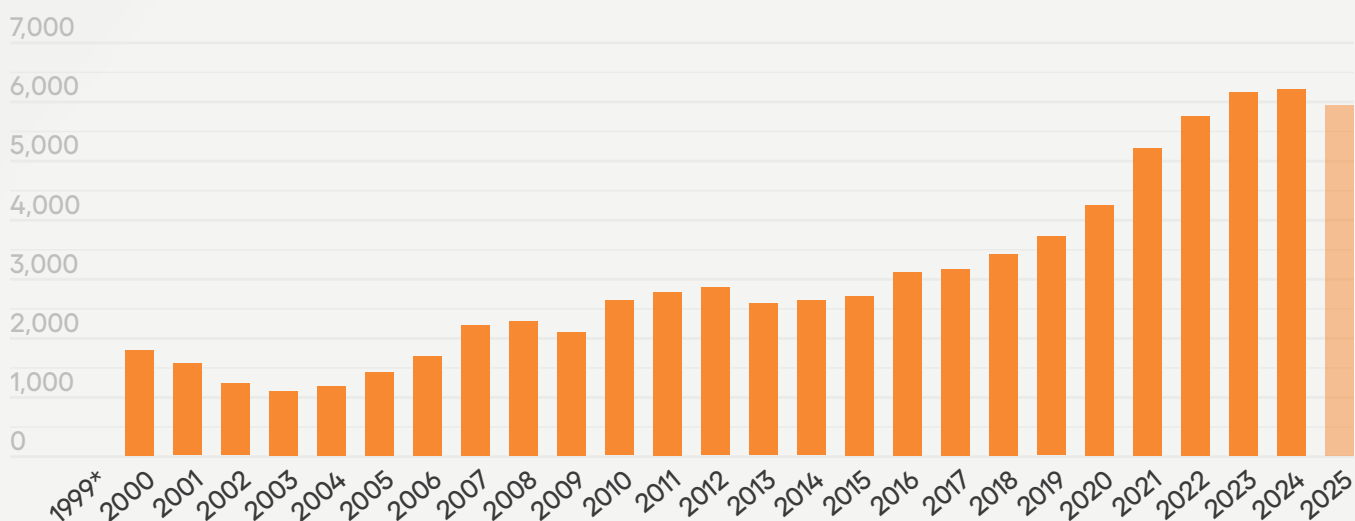
-2.58%

UDRP Decisions v. Q2 2024

-38.98%

UDRP Domain Names v. Q2 2024

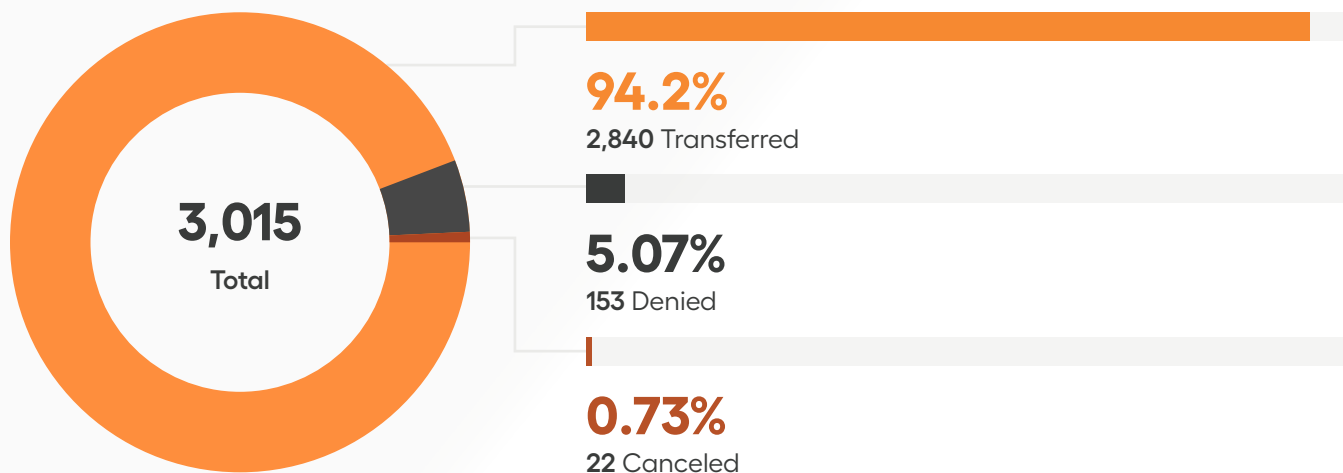
WIPO Domain Name Cases by Year



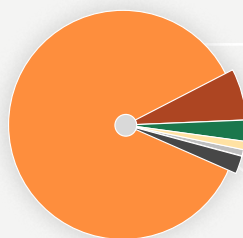
* One case was filed in 1999 Estimate for 2025

Data on this graph includes all domain name dispute policies administered by WIPO, including cases outside of the UDRP, such as ccTLD-specific policies. Estimate of 2025 cases is based on data as of July 13, 2025.

Outcome of UDRP Decisions



UDRP Case Size



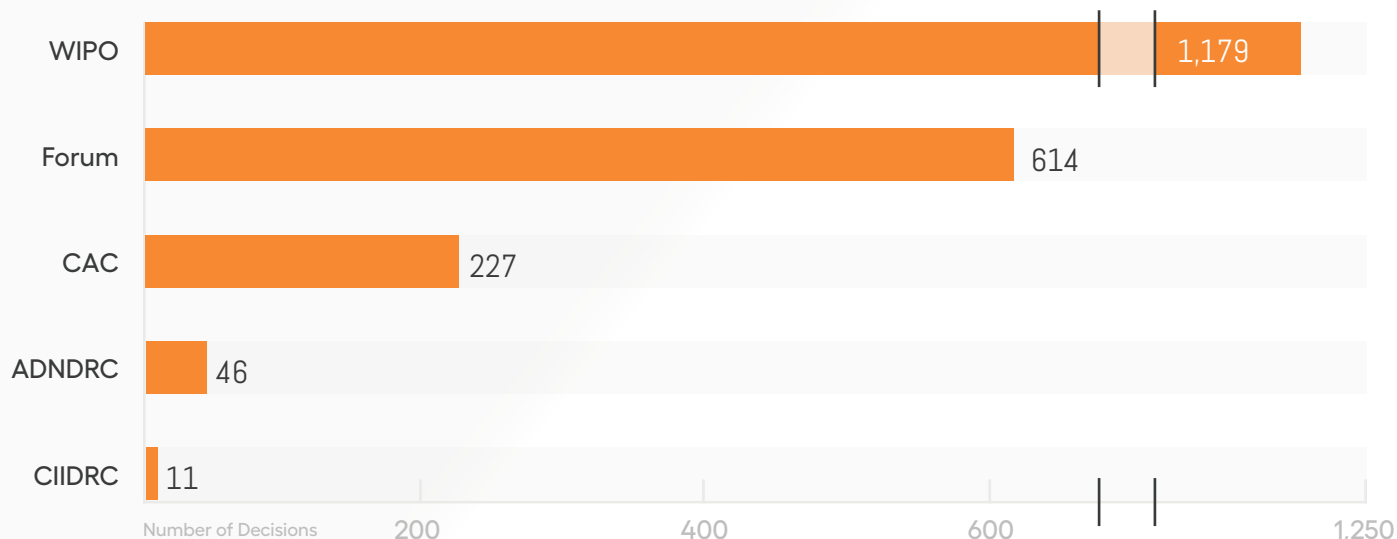
No. of Domain Names	% of Cases
1	85.86%
2	6.90%
3	2.84%
4	1.12%
5	0.86%
6+	2.41%

Largest UDRP Cases

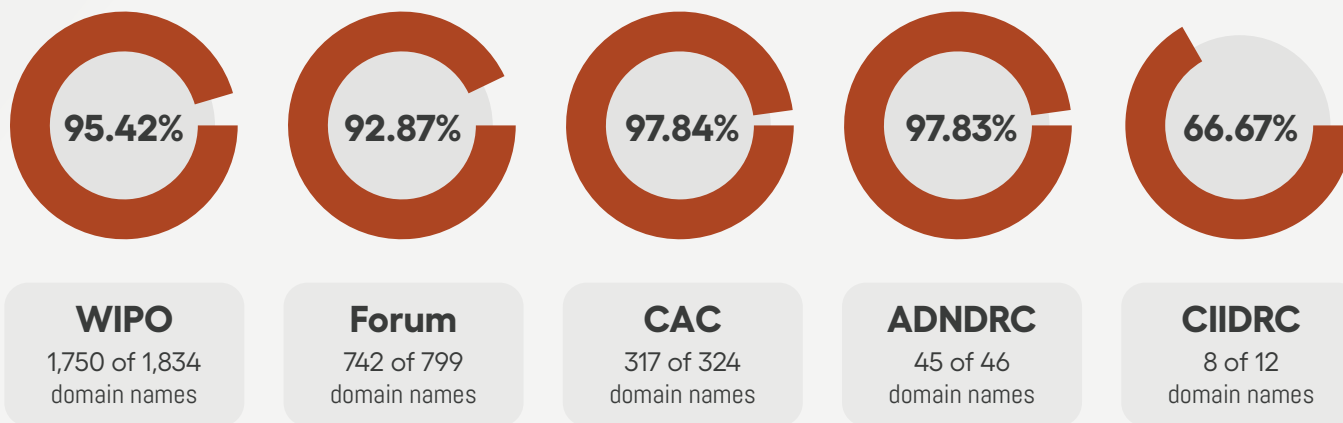
Complainant	Case No.	No. of Domains
Tesla	D2025-1306	52
Barrick Gold	D2025-1556	21
Carrefour	D2025-0498	19
Hunza G	D2025-0623	18
Carrefour	D2025-0966	18
Burlington Coat Factory	D2025-0465	17
J.P. Boden	D2025-1385	15
Licensing IP Int'l	FA2502002142821	15
Brookson Group	D2025-1665	15
Imiracle	CAC-UDRP-107541	14
Carrefour	D2025-1201	13
Razor Trade	FA2505002153634	13
Sfanti Grup	D2024-5089	12

Complainant	Case No.	No. of Domains
Gym King	D2025-1370	12
RE/MAX	D2025-1430	11
Fergal Investments	FA2505002153635	11
Mondo Convenienza	CAC-UDRP-107332	11
dm-drogerie	CAC-UDRP-107587	10
Swatch	D2025-1425	10
Tonks	D2025-0800	10
Galeries Lafayette	D2025-0802	10
ecoATM	D2025-1429	10
Fenix Int'l	D2025-1201	10
Comscore	D2025-0849	10
Fabbrica d'Armi Pietro Beretta	CAC-UDRP-107556	9

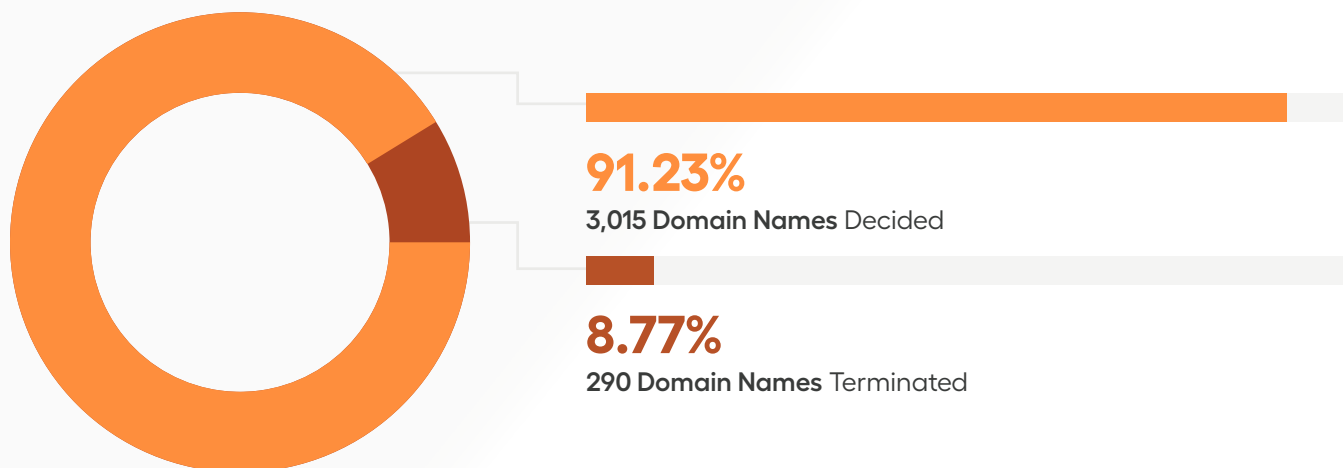
Number of UDRP Decisions by Provider



Transfer/Cancellation Rate by Provider



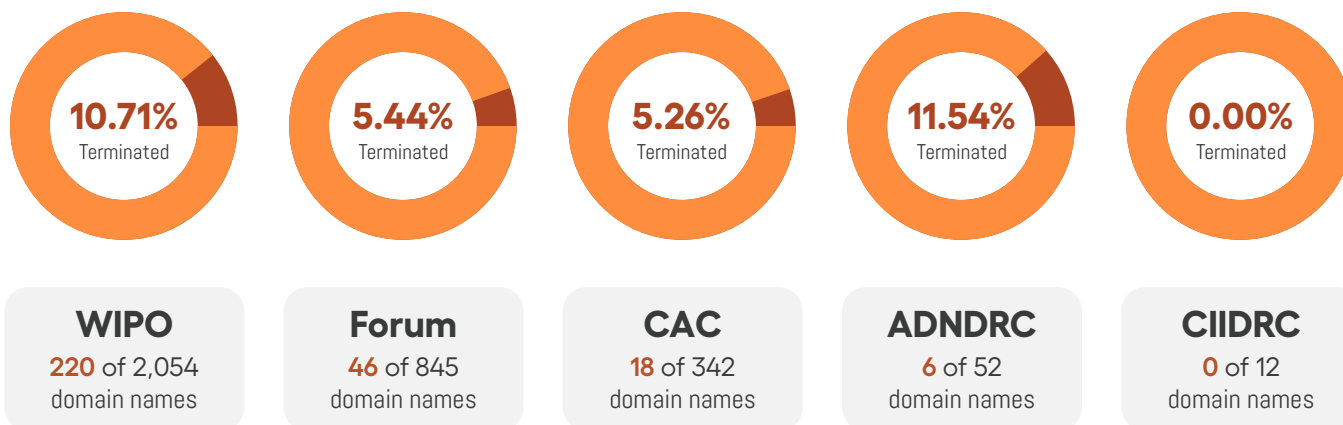
UDRP Terminations



A UDRP proceeding may be **terminated** – prior to a decision – for various reasons, including settlement (Rule 17(a)); if “it becomes unnecessary or impossible to continue the administrative proceeding for any reason” (Rule 17(b)); or “legal proceedings initiated prior to or during an administrative proceeding” (Rule 18(a)).

Although the data on all other pages of GigaLaw’s Domain Dispute Digest reflect only decided cases, the data on this page explores the scope of terminated cases, which include those terminated due to a settlement between the parties (which may – but does not necessarily – result in a transfer of the disputed domain name to the complainant) or otherwise.

UDRP Terminations by Provider

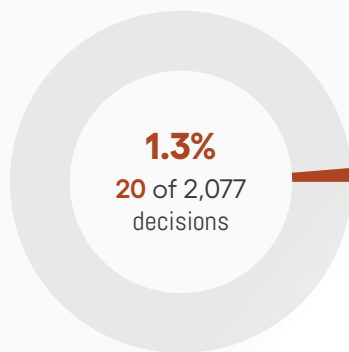


Reverse Domain Name Hijacking (RDNH)

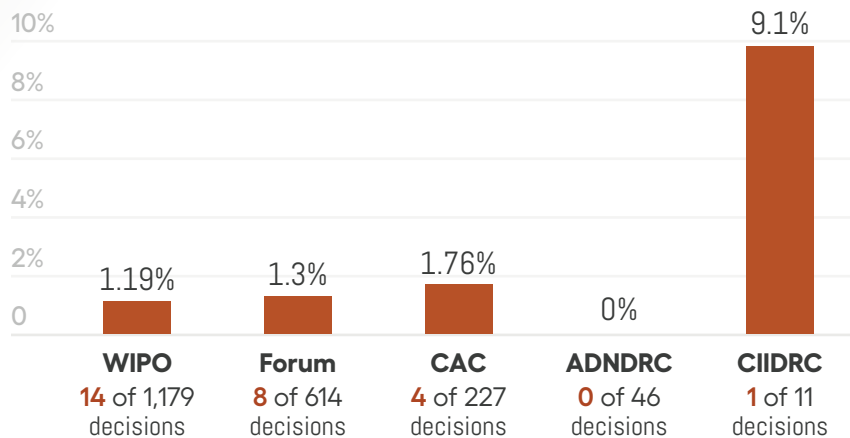
The UDRP Rules define “Reverse Domain Name Hijacking” (RDNH) as “using the Policy in bad faith to attempt to deprive a registered domain-name holder of a domain name.”

The Rules provide that the “Panel shall declare in its decision that the complaint was brought in bad faith and constitutes an abuse of the administrative proceeding” if it “finds that the complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or was brought primarily to harass the domain-name holder.”

RDNH (All Providers)



RDNH by Provider

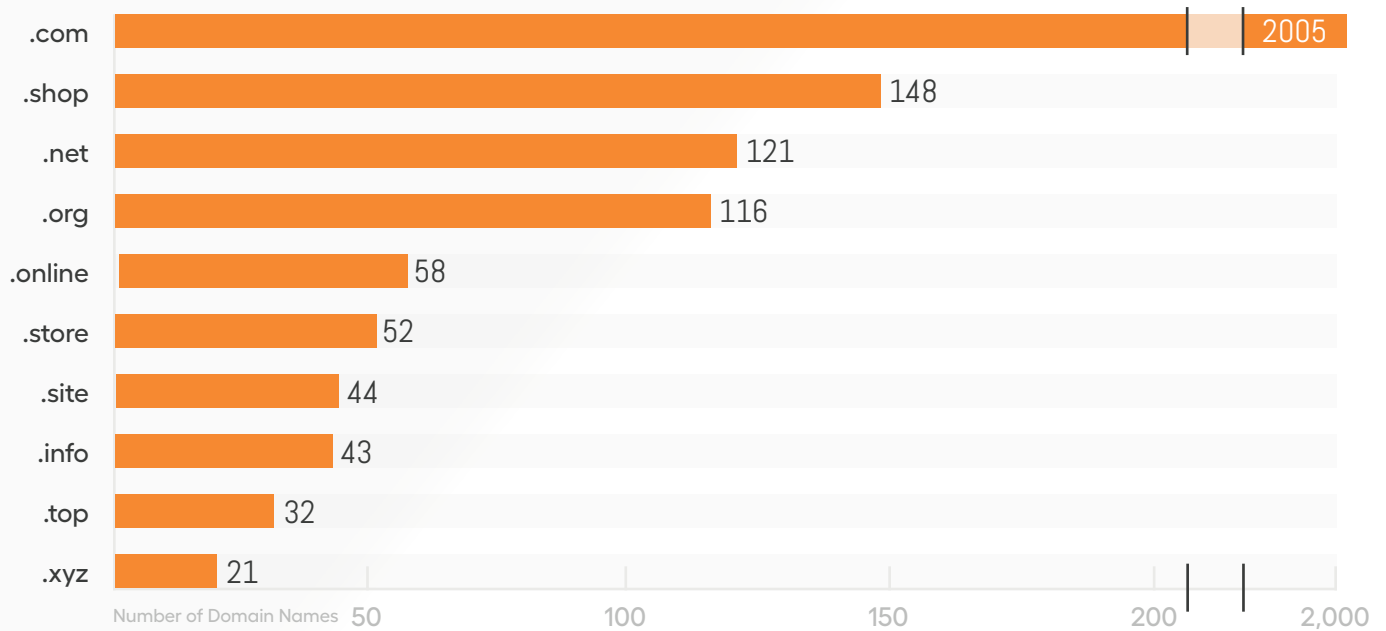


RDNH Decisions

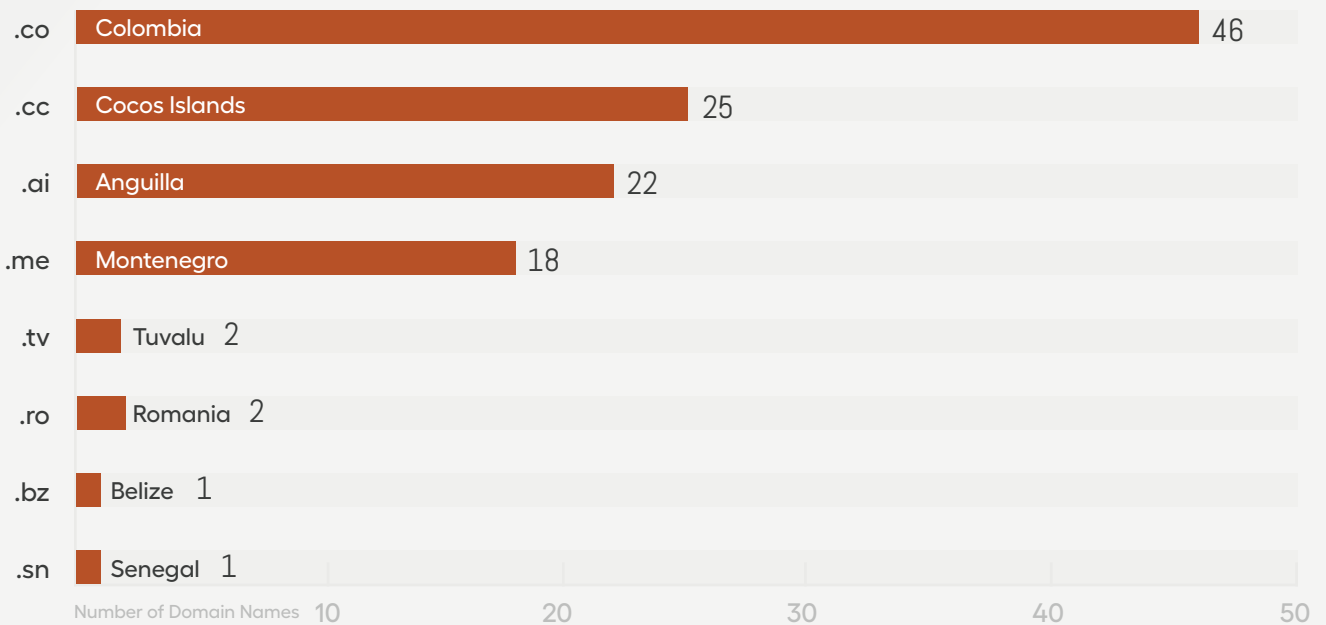
Complainant	Domain Name	Case No.
Dakota Financial	<haulpay.com>	WIPO D2025-0448
Mobility SAS	<novagaming.com>	WIPO D2025-0774
Veracyte	<genomedex.com>	Forum FA2503002147139
Cosmetic Research Group	<soskin.com>	WIPO D2025-0784
Guangdong Qisitech	<geekbarcm.com>	CAC-UDRP-107372
Guangdong Qisitech	<geekbari.com>	CAC-UDRP-107372
Guangdong Qisitech	<geekbarz.com>	CAC-UDRP-107372
East Coast Renaissance	<seattlefoodtrucks.org>	WIPO D2025-0940
Renu Medisp	<renewcda.com>	Forum FA2503002143814
Bennett, Coleman & Co.	<timesnow.com>	WIPO D2025-0145
Quality Transportation Services	<smartrail.com>	Forum FA2504002148588
Illinois Agricultural Association	<iaa.org>	Forum FA2504002150996
Knowledge Systems	<ks.com>	WIPO D2025-0756
Zaddy	<zaddy.com>	WIPO D2025-0837

Complainant	Domain Name	Case No.
Exness	<exnesscam.com>	CAC-UDRP-107488
Spartacus Brands	<decodeage.com>	WIPO D2025-1023
Nola Electric and Maintenance Services	<nolaelectric.com>	Forum FA2505002153709
Finsure	<finsure.com>	WIPO D2025-1070
Alumni Ventures	<alumniventures.com>	WIPO D2025-1624
Vorwerk International	<tm7.com>	WIPO D2025-1260
AT Ferrell Company	<ferrellross.com>	CIIDRC 25114-UDRP
Afianza Asesores	<afianza.com>	WIPO D2025-1542
Felipe Ospina	<watertimer.com>	WIPO D2025-1642
Mengjia Li (Eve Li)	<eveli.com>	Forum FA2505002156311
Itway	<icoy.com>	WIPO D2025-1294
MyHikes	<myhikes.com>	Forum FA2505002156965
ContractPod Technologies	<leah.ai>	Forum FA2506002162186

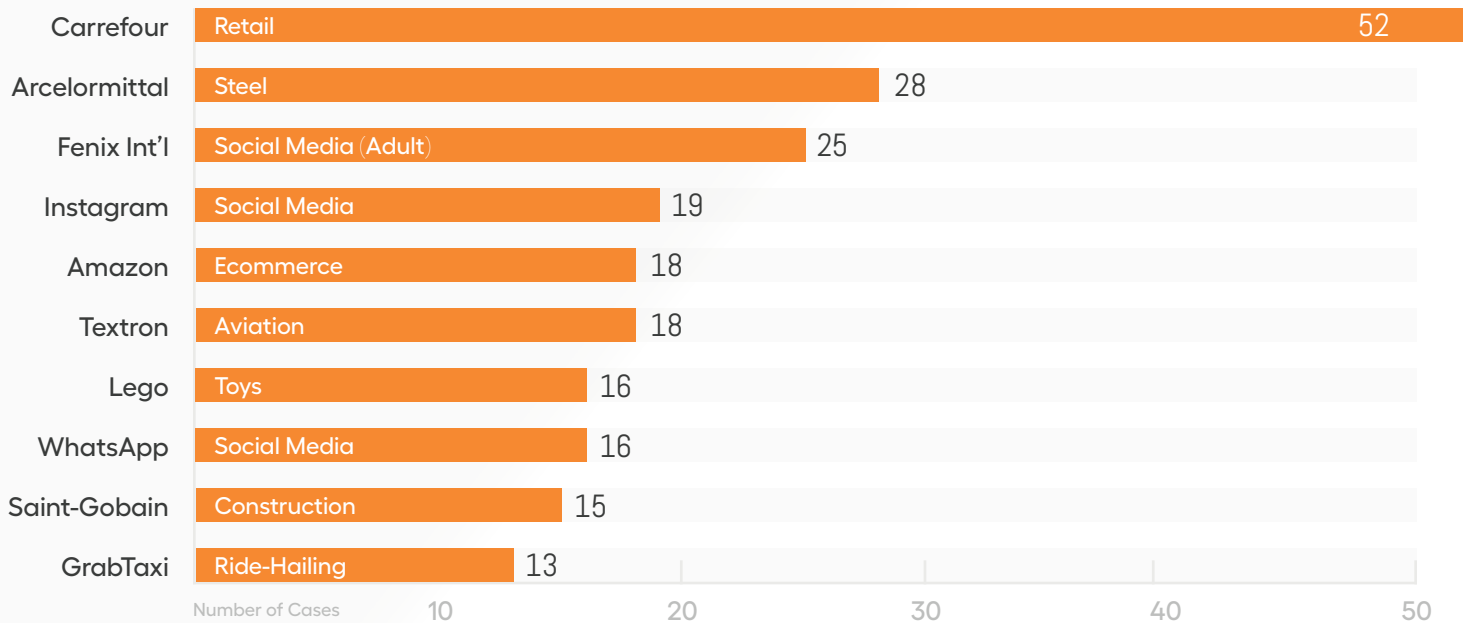
Most Common gTLDs in UDRP Cases



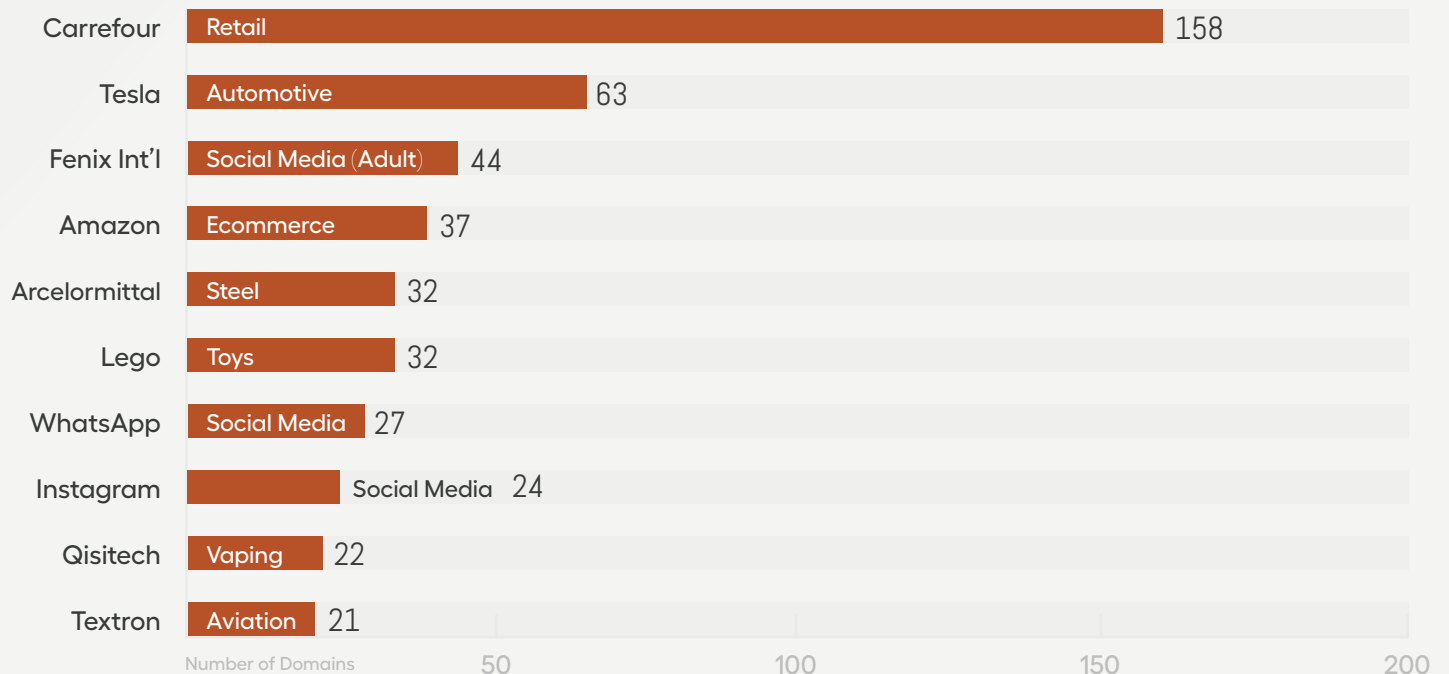
Most Common ccTLDs in UDRP Cases



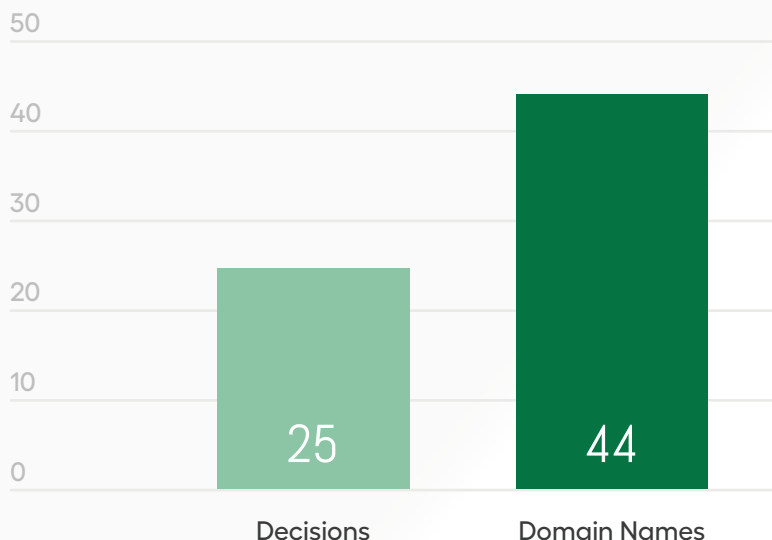
Most Active Trademark Owners (UDRP Cases)



Most Active Trademark Owners (Domain Names in UDRP)



Number of URS Decisions and Domain Names



-54.55%

URS Decisions v. Q2 2024

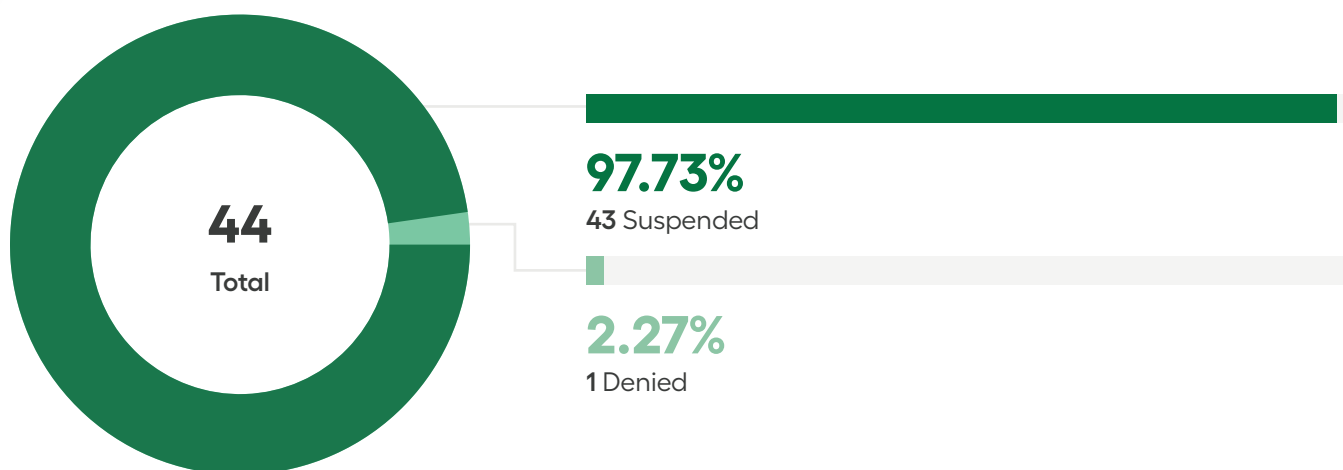
-25.42%

URS Domain Names v. Q2 2024

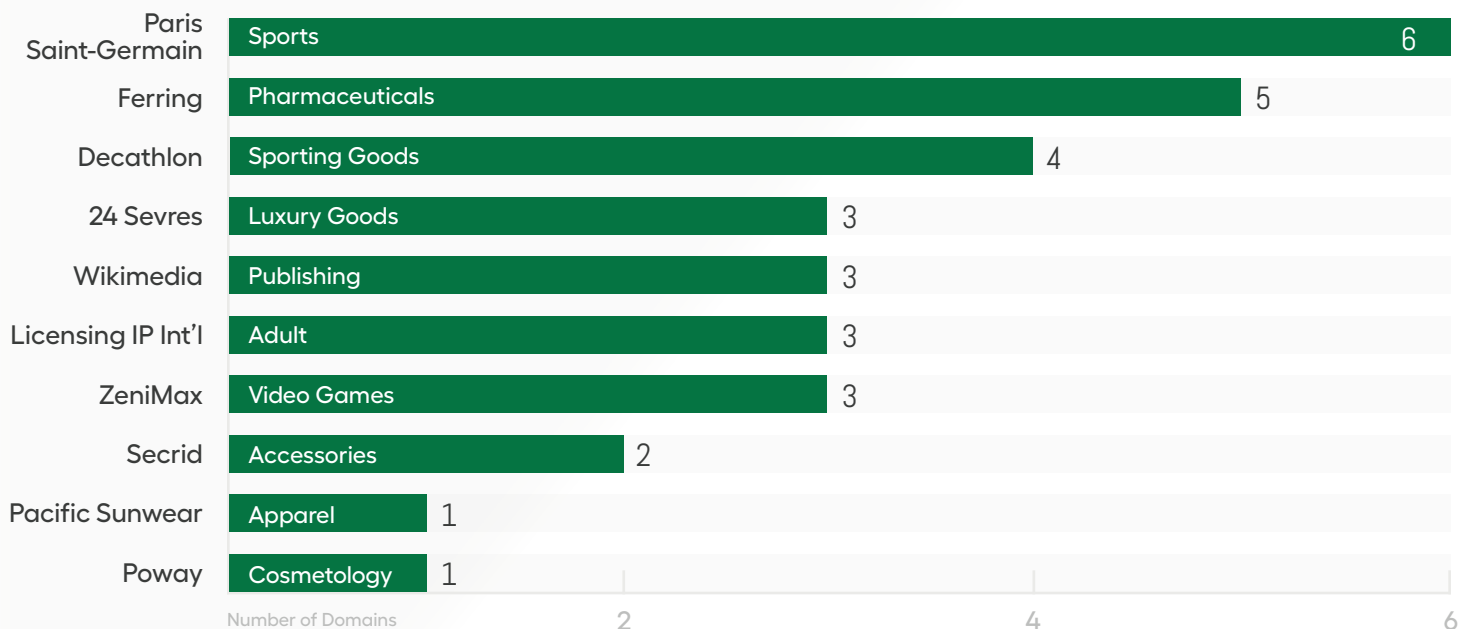
URS or UDRP?

Although the Uniform Rapid Suspension System (URS) is less expensive and usually faster than the UDRP, it remains unpopular because it does not apply to .com domain names, it only allows for the temporary suspension (not transfer) of domain names, and it has a higher burden of proof than the UDRP. Given the relatively few cases that are filed, data for any quarter is of limited value.

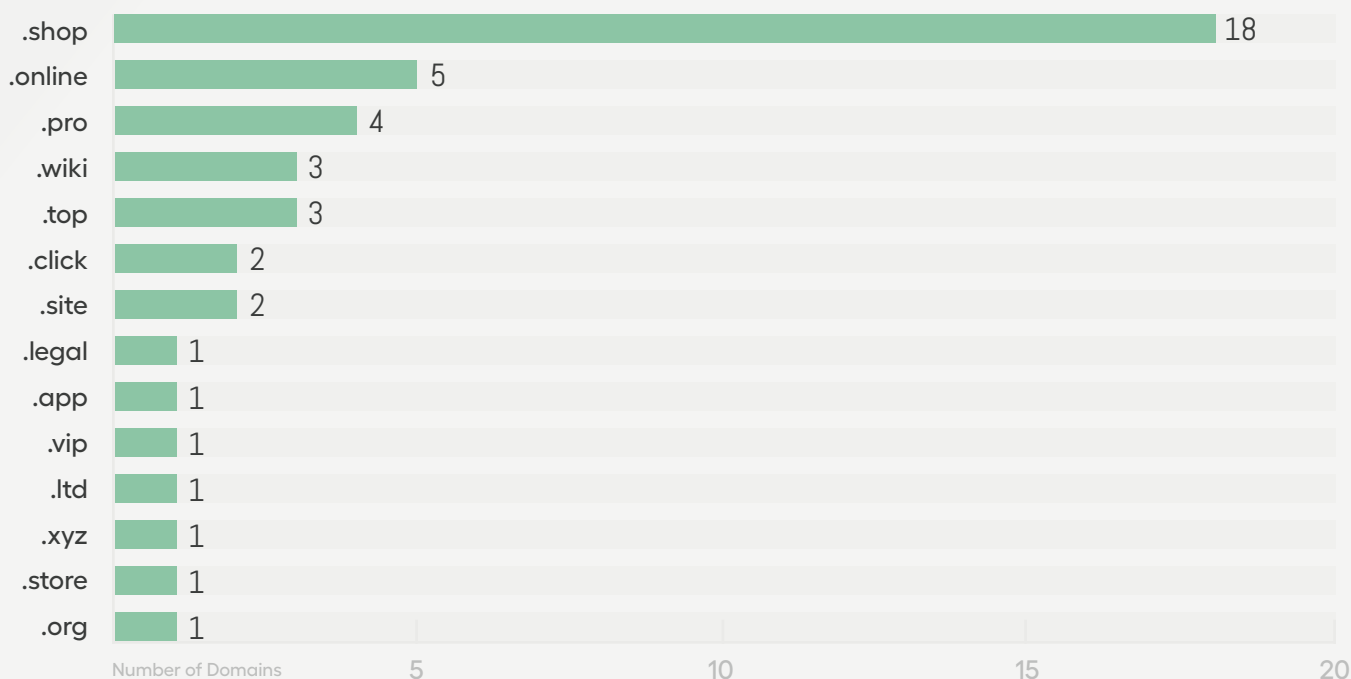
Outcome of URS Decisions



Most Active Trademark Owners (URS Domain Names)



Most Common gTLDs (URS Domain Names)



SPOTLIGHT

Coming Soon: Disputes Over ICANN's Next Round of New gTLDs

Thirteen years after its initial round of the "New gTLD Program," ICANN is getting close to launching a new round, releasing its Draft Applicant Guidebook on May 30, 2025; and announcing its dispute resolution service providers on July 3, 2025.

The 2012 round attracted 1,930 applications for new top-level domains (TLDs), though not all of the applications resulted in the creation of new TLDs (the most popular of which have turned out to be .top, .xyz, .shop, .online and .store). In the original application round, ICANN allowed both applicants and third parties to file objections to applications – a tool that will be available again after applications are filed, presumably in 2026.

The Draft Applicant Guidebook says: "Parties with standing, including other applicants, have the opportunity to file objections to any application on specific grounds and have them considered before a panel of qualified experts. If an application is subject to an objection, the applicant will have an opportunity to file a response. All applied-for gTLDs and applied-for allocatable variant strings will be subject to the objection processes."

Specifically, the Draft Applicant Guidebook contemplates the following types of objections:

- ▶ **String Confusion:** "The applied-for primary string, its allocatable variant label, or its blocked variant label is confusingly similar visually, aurally, or in meaning to an existing TLD and/or another applied-for primary gTLD string and/or any of its allocatable or blocked variant strings."

- ▶ **Legal Rights:** "An applied-for string and/or one or more applied-for allocatable variant string(s) infringes its existing legal rights."
- ▶ **Limited Public Interest:** "The applied-for string and/or one or more applied-for allocatable variant string(s) are contrary to generally accepted legal norms of morality and public order that are recognized under principles of international law."
- ▶ **Community:** "There is well-substantiated opposition to an applied-for string and/or one or more applied-for allocatable variant string(s) from a significant portion of the community which the string may be explicitly or implicitly targeting."



In the previous round of ICANN's gTLD expansion, GigaLaw's Doug Isenberg represented both applicants and trademark owners in objection proceedings. Isenberg expects to do so again in the upcoming round.

ICANN has announced that the International Chamber of Commerce (ICC) and the World Intellectual Property Organization (WIPO) will serve as dispute resolution providers (DRSPs) for objections filed under the new round of gTLDs.

As ICANN has said: "The filed objections will go through an administrative review conducted by the DRSP before having their substance reviewed by a one- or three-expert panel, which will issue a determination. The non-prevailing party in an objection will have the opportunity to file an appeal against the panel determination."

Glossary

ADNDRC

The Asian Domain Name Dispute Resolution Centre, an ICANN-approved provider of UDRP services, has four operating offices: the Hong Kong International Arbitration Centre (HKIAC), the Korea Internet Address Dispute Resolution Committee (KIDRC), the China International Economic and Trade Arbitration Commission (CEITAC), and the Asian International Arbitration Centre (AIAC).

Business Email Compromise

A business email (BEC) compromise scam is a type of phishing activity that attempts to get someone to divulge confidential company information or send payment for a fraudulent invoice or to an inaccurate account. Like phishing in general, BEC scams rely on cybersquatting to trick their targets into taking action.

CAC

The Czech Arbitration Court, an ICANN-approved provider of UDRP services, is based in Prague and also provides services for .eu disputes.

ccTLD

A country-code top-level domain (ccTLD) refers to a TLD used by a specific country, such as .us for the United States. All ccTLDs consist of only two letters and may be subject to various domain name dispute policies. Of the 316 ccTLDs, about 45 participate in the UDRP, while some others have adopted different dispute policies, and some have not dispute policies at all.

CCIDRC

The Canadian International Internet Dispute Resolution Centre, an ICANN-approved provider of UDRP services, is based in Vancouver and is the newest UDRP service provider. CIIDRC also provides services for .ca disputes.

Complainant

A complainant in the context of a domain name dispute, such as the UDRP, refers to a trademark owner who files a complaint against a domain name registrant or cybersquatter, seeking transfer, cancellation or (in the case of a URS proceeding) suspension of a domain name.

Cybersquatting

"Cybersquatting" is a term that is loosely used to describe the registration and/or use of a domain name that is identical or confusingly similar to someone else's trademark, without permission. The word surely is an extension of the legal definition of "squatter," which apparently was first used in 1788 to describe "one that settles on property without right or title or payment of rent." One of the earliest judicial references to "cybersquatting" is in a 1998 opinion from the U.S. District Court for the Central District of California. Cybersquatting often prompts trademark owners to file complaints under domain name dispute policies such as the UDRP to seek transfer of one or more disputed domain names.

Domain Name

A domain name refers to a top-level domain (TLD) plus, at least, a second-level domain. For example, "example.com" is a domain name.

Domaining

"Domaining" is a term that is loosely used to describe the business of trafficking in domain names. While some domaining activity is illegal and may violate dispute policies such as the UDRP, other domaining activity – such as the registration of domain names that are not identical or confusingly similar to preexisting trademarks or the use of domain names in ways that are unrelated to trademarks – may be legal and appropriate.

Forum

Formerly known as the National Arbitration Forum, the Forum is an ICANN-approved provider of UDRP services based in Minneapolis, Minnesota (USA). The Forum also provides services under the URS; for the .us ccTLD; and for certain registry-specific dispute policies.

gTLD

A generic or global top-level domain (gTLD) refers to a TLD that is not assigned to a specific country (a ccTLD) or reserved for use and sponsored by specific types of entities. Popular gTLDs include .com, .net and .org.

ICANN

The Internet Corporation for Assigned Names and Numbers, formed in 1998, is a nonprofit public benefit corporation that manages the domain name system, including many domain name dispute policies (especially the UDRP) and the programs for creation of new gTLDs. ICANN's mission is "to help ensure a stable, secure, and unified global Internet."

MFSD

Described as an "independent private Italian alternative dispute resolution center with focus on IP issues," MFSD is an ICANN-approved provider of URS services and also handles disputes for the .it ccTLD.

New gTLD

A "new" generic or global top-level domain (gTLD) refers to a domain name that was created following ICANN's expansion of the domain name system that resulted from an application process in 2012. More than 1,000 new gTLDs were delegated by ICANN in the years since applications were opened, resulting in relatively popular new gTLDs such as .xyz, .online and .top – as well as more obscure new gTLDs such as .pharmacy, .dad and .kitchen. Some of the new gTLDs are restricted and are referred to as "branded domains" managed by trademark owners, such as .apple, .xbox and .marriott.

Panel

A panel refers to the person(s) who are assigned to review a file in a domain name dispute case, such as a UDRP proceeding, and issue a decision, including whether to transfer the domain name to the complainant or allow it to remain with the respondent. In UDRP cases, a panel consists of one or three people, depending on the elections made by the parties.

Phishing

The U.S. Federal Trade Commission (FTC) defines phishing as "a type of online scam that targets consumers by sending them an e-mail that appears to be from a well-known source – an internet service provider, a bank, or a mortgage company, for example." Most phishing scams rely on cybersquatting to trick their targets into providing personal identifying information.

PPC

A pay-per-click (PPC) web page contains targeted advertisements (typically consisting exclusively or primarily of text and relating to the domain name used by the website) in which the advertiser pays a fee based on number of times Internet users click on a link in the advertisement.

Registrant

A domain name registrant, or simply a registrant, is the holder of a domain name registration (such as <example.com>) and is typically referred to in a domain name dispute proceeding as the respondent.

Registrar

A registrar is a company engaged in the business of offering domain name registrations, typically pursuant to an agreement with ICANN. Popular retail registrars (which offer registrations to the public) include GoDaddy, Namecheap, Tucows and Network Solutions.

Registry

A registry operator, or simply a registry, is an entity responsible for management of a TLD. Every TLD is associated with a single registry, which in turn typically contracts with registrars that offer domain name registrations to the public. For example, VeriSign Global Registry Services is the registry operator for .com and .net.

Reverse Domain Name Hijacking (RDNH)

Reverse Domain Name Hijacking (RDNH) is defined by the UDRP Rules as “using the [UDRP] in bad faith to attempt to deprive a registered domain-name holder of a domain name.”

Respondent

A respondent in the context of a domain name dispute, such as the UDRP, refers to a domain name registrant against whom a trademark owner files a complaint.

Second-Level Domain

A second-level domain (SLD) refers to that portion of a domain name immediately to the left of a TLD, and is often the portion of a domain name that is registered by a registrant. For example, in the domain name <example.com>, “example” is the second-level domain.

Sponsored TLD

A sponsored top-level domain (TLD) is reserved for use by specific entities that meet defined criteria, such as .int for certain intergovernmental organizations; .gov for U.S.-based government organizations; and .edu for U.S.-based postsecondary institutions.

TLD

A top-level domain (TLD) refers to the rightmost characters in a domain name, such as .com. For example, in the domain name <example.com>, “.com” is the TLD. Every TLD is managed by a single registry operator and is subject to certain policies, such as those for resolving domain name disputes.

Typosquatting

“Typosquatting” is a type of cybersquatting that describes the registration and/or use of a domain name that contains a typographical variation of a trademark, such as by omitting or adding a character or transposing one or more characters, usually for the purpose of creating a likelihood of confusion.

UDRP

The Uniform Domain Name Dispute Resolution Policy (UDRP) is the popular domain name dispute policy adopted by ICANN in 1999, pursuant to which trademark owners file complaints against registrants or cybersquatters seeking the transfer or cancellation of a domain name. A successful UDRP complaint requires a complainant to prevail on all elements of a three-part test.

URS

The Uniform Rapid Suspension System (URS) is a domain name dispute policy created as an alternative to the UDRP when ICANN engaged in expansion of the domain name system that led to new gTLDs. However, unlike the UDRP, the URS does not apply to .com domain names, and trademark owners can only seek the temporary suspension – not transfer – of a disputed domain name. Because of these limitations and its high burden of proof, the URS, unlike the UDRP, has not proven popular.

WIPO

The World Intellectual Property Organization’s Arbitration and Mediation Center is the largest of the ICANN-approved UDRP service providers and helped create the UDRP. Based in Geneva, WIPO is a self-funding agency of the United Nations, with 193 member states. In addition to the UDRP, WIPO provides services for about 40 ccTLD dispute policies.

WIPO Overview

The WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (more informally known as the “WIPO Overview”) is a document created by WIPO that purports to “summarize consensus panel views on a range of common and important substantive and procedural issues” under the UDRP. The document contains references to many relevant UDRP decisions and is often cited by complainants, respondents and panels in UDRP proceedings.

About Domain Name Disputes and GigaLaw

This report focuses primarily on the Uniform Domain Name Dispute Resolution Policy (UDRP), the ICANN policy that provides trademark owners with an inexpensive and quick legal process to combat cybersquatting. It applies to .com and all of the global or generic top-level domains (gTLDs), as well as

about 44 country-code top-level domains (ccTLDs). This report also includes data on the Uniform Rapid Suspension System (URS), a more limited policy that primarily addresses only disputes in the new gTLDs (.aaa to .zuerich), created in recent years.



Doug Isenberg (left), founder of GigaLaw and one of the world's most active domain name attorneys, frequently represents trademark owners under the UDRP, the URS and ccTLD-specific policies. He filed the largest UDRP complaint ever, for more than 1,500 domain names, in 2009. He also serves as a domain name panelist for all five of the ICANN-approved UDRP service providers. The *World Trademark Review* has said that Doug is “a whiz on all things to do with Internet law and domain names”; the *Atlanta Business Chronicle* has called him an “international authority on Internet law”; and he is regularly included in *The Best Lawyers in America* for technology law.

For more information, visit www.Giga.Law or email Doug@Giga.Law

This issue of GigaLaw's Domain Dispute Digest includes UDRP data from WIPO, the Forum, CAC, ADNDRC and CIIDRC; and URS data from the Forum and MFSD. Analyzed data is for decisions from April 1 – June 30, 2025, unless otherwise noted. Except where terminated cases are expressly reported, they have been excluded from the analysis. The current Digest attempts to capture UDRP decisions published but not necessarily dated in the quarter, which may differ from the analysis applied in previous issues of the Digest. This report is for general informational purposes only, provides only a summary of specific issues, and is not intended to be and should not be relied upon as legal advice regarding any specific situation. This report is not intended to create, and does not constitute, an attorney-client relationship. Readers should consult with legal counsel to determine how laws, policies or decisions and other topics discussed in this report apply to the readers' specific circumstances. This report may be considered attorney advertising under court rules of certain jurisdictions.

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