

Decision for dispute CAC-UDRP-108906

Case number	CAC-UDRP-108906
Time of filing	2026-08-06 10:28:42
Domain names	jcbecaux.com

Case administrator

Name	Olga Dvořáková (Case admin)
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Complainant

Organization	JCDECAUX SE
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Complainant representative

Organization	NAMESHIELD S.A.S.
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Respondent

Organization	marymay co.,ltd
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OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain name.

IDENTIFICATION OF RIGHTS

Complainant owns several trademarks “JCDECAUX” such as the international trademark registration JCDECAUX n° 803987 registered since November 27, 2001.

Complainant is also the owner of a large domain names portfolio, including the same distinctive wording JCDECAUX, such as <jcdecaux.com> registered since June 23, 1997.

The disputed domain name <jcbecaux.com> was registered on July 30, 2026 and resolves to a parking page. Besides, MX servers are configured.

FACTUAL BACKGROUND

Since 1964, the Complainant is the worldwide number one in outdoor advertising. Throughout the world, the company’s success is driven by meeting the needs of local authorities and advertisers by a constant focus on innovation. For 60 years, the Complainant has been offering solutions that combine urban development and the provision of public services in more than 80 countries. The Complainant is currently the only international player focused exclusively on Tou-of-Home, developing 3 areas of business: street furniture, transport and billboard advertising.

The Complainant is an international outdoor advertising company whose activities include street furniture, transport advertising and billboard advertising. The Complainant has operated under the name and mark JCDECAUX for several decades and has an extensive international presence.

The Complainant owns trademark rights in JCDECAUX, including International Trademark Registration No. 803987, registered on 27 November 2001. It also owns and uses the domain name jcdeaux.com, registered on 23 June 1997.

The disputed domain name jcbecaux.com was registered on 30 July 2026. It resolves to a registrar parking page. MX records have also been configured for the disputed domain name.

The Complainant states that the disputed domain name <jcbecaux.com> is confusingly similar to its trademark JCDECAUX. The obvious misspelling of the Complainant's trademark (i.e. the substitution of the letter "D" by the letter "B") is characteristic of a typosquatting practice intended to create confusing similarity between the Complainant's trademark and the disputed domain name.

Furthermore, the Complainant contends that the addition of the suffix ".COM" does not change the overall impression of the designation as being connected to the Complainant's trademark. It does not prevent the likelihood of confusion between the disputed domain name and the Complainant, its trademark, and its associated domain name.

The Complainant asserts that the Respondent is not identified in the WHOIS database as the owner of the disputed domain name. Past panels have held that a Respondent was not commonly known by a disputed domain name if the Whois information was not similar to the disputed domain name. Thus, the Respondent is not known as the disputed domain name.

The Complainant contends that the Respondent is not affiliated with nor authorized by JCDECAUX in any way. The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name, and he is not related in any way to its business. The Complainant does not carry out any activity for, nor has any business with, the Respondent.

Neither licence nor authorization has been granted to the Respondent to make any use of the Complainant's trademark JCDECAUX or apply for registration of the disputed domain name by the Complainant.

Besides, the Complainant also claims that the disputed domain name is a typosquatted version of the trademark JCDECAUX. Typosquatting is the practice of registering a domain name in an attempt to take advantage of Internet users' typographical errors and can be evidence that a respondent lacks rights and legitimate interests in the domain name.

Finally, the disputed domain name resolves to a registrar parking page. The Complainant contends that the Respondent did not use the disputed domain name, and it confirms that Respondent has no demonstrable plan to use the disputed domain name.

The disputed domain name is identical to the Complainant's trademark JCDECAUX. The Complainant asserts that its trademark JCDECAUX was already known for decades and protected in several countries at the time of the registration. The Complainant is doing business in more than 80 countries worldwide and is listed at the Euronext Paris stock exchange.

Thus, given the distinctiveness of the Complainant's trademark and reputation, the Complainant states that the Respondent has registered the disputed domain name with full knowledge of the Complainant's trademark JCDECAUX and therefore could not ignore the Complainant.

Moreover, the Complainant states the misspelling of the trademark JCDECAUX was intentionally designed to be confusingly similar to the Complainant's trademark. Previous UDRP Panels have seen such actions as evidence of bad faith.

Furthermore, the disputed domain name resolves to a registrar parking page. The Complainant contends that the Respondent has not demonstrated any activity in respect of the disputed domain name, and it is not possible to conceive of any plausible actual or contemplated active use of the domain name by the Respondent that would not be illegitimate, such as by being a passing off, an infringement of consumer protection legislation, or an infringement of the Complainant's rights under trademark law.

As prior WIPO UDRP panels have held, the incorporation of a famous mark into a domain name, coupled with an inactive website, may be evidence of bad faith registration and use.

Finally, the domain name has been set up with MX records, which suggests that it may be actively used for email purposes.

PARTIES CONTENTIONS

Complainant

The Complainant contends that the requirements of paragraph 4(a) of the Uniform Domain Name Dispute Resolution Policy (the "Policy") have been met and requests that the disputed domain name be transferred to it.

In particular, the Complainant submits that the disputed domain name is confusingly similar to its JCDECAUX trademark because it differs from that mark only through the substitution of the letter "d" with the letter "b". According to the Complainant, this is an obvious case of typosquatting.

The Complainant further submits that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not affiliated with the Complainant, has not been authorised or licensed to use the JCDECAUX mark and is not commonly known by the disputed domain name. The disputed domain name resolves only to a parking page and is not being used for a bona fide offering of goods or services or for any legitimate noncommercial or fair purpose.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. The JCDECAUX mark predates the registration of the disputed domain name by more than 20 years and is well known. The deliberate one-letter misspelling shows that the Respondent targeted the Complainant and its mark. The Complainant also relies on the parking page and the configuration of MX records as further circumstances supporting bad faith.

Respondent

No administratively compliant Response has been filed.

RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

PROCEDURAL FACTORS

The Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

1. Identical or Confusingly Similar

The evidence establishes that the Complainant owns registered trademark rights in JCDECAUX, including International Trademark Registration No. 803987. The Complainant therefore has standing under paragraph 4(a)(i) of the Policy.

The disputed domain name reproduces the JCDECAUX mark with only one change: the letter “d” is replaced by the letter “b”, resulting in “jcbecaux”. The mark remains readily recognisable in the disputed domain name. Such an obvious and minor misspelling is characteristic of typosquatting and does not prevent a finding of confusing similarity. See section 1.9 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, version 3.1 (“WIPO Overview 3.1”).

The generic Top-Level Domain “.com” is a standard registration requirement and is disregarded for purposes of the first-element comparison. See section 1.11.1 of the WIPO Overview 3.1.

The Panel therefore finds that the disputed domain name is confusingly similar to the Complainant’s JCDECAUX trademark. The Complainant has established the first element of paragraph 4(a) of the Policy.

2. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets out a non-exhaustive list of circumstances in which a respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof rests with the Complainant, panels have recognised that requiring a complainant to prove the absence of a respondent’s rights or legitimate interests may involve the difficult task of proving a negative. It is therefore sufficient for a complainant to establish a prima facie case, at which point the burden of production shifts to the respondent. See section 2.1 of the WIPO Overview 3.1; Croatia Airlines d.d. v. Modern Empire Internet Ltd., WIPO Case No. D2003-0455.

The Complainant states that it has not authorised, licensed or otherwise permitted the Respondent to use the JCDECAUX trademark or to register the disputed domain name. Nothing in the record indicates that the Respondent is commonly known by the disputed domain name, has acquired trademark rights corresponding to it, or has made demonstrable preparations to use it in connection with a bona fide offering of goods or services.

The disputed domain name is a typosquatted version of the Complainant’s distinctive mark and of the domain name used for the Complainant’s official website. Its composition carries a significant risk of misleading Internet users seeking the Complainant. The parking page shown in the evidence does not establish a bona fide offering of goods or services or a legitimate noncommercial or fair use.

The Complainant has therefore made out a prima facie case. The Respondent has not filed a Response and has provided no evidence capable of rebutting it.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has established the second element of paragraph 4(a) of the Policy.

3. Registration and Use in Bad Faith

The circumstances listed in paragraph 4(b) of the Policy are non-exhaustive. The question is whether, having regard to the totality of the circumstances, the disputed domain name was registered and is being used in bad faith.

The Complainant’s trademark rights long predate the registration of the disputed domain name. The JCDECAUX mark is distinctive, and its well-known character for UDRP purposes has been recognised in previous decisions. See, for example, JCDecaux SA v. Wang Xuesong, Wangxuesong, WIPO Case No. DCC2017-0003.

The disputed domain name differs from the Complainant’s mark and principal domain name only by the substitution of one visually similar letter. The Panel considers it highly improbable that the Respondent selected this precise misspelling independently or by coincidence. On the balance of probabilities, the Respondent knew of and deliberately targeted the Complainant and its JCDECAUX mark when registering the disputed domain name. The typosquatting character of the registration is itself a strong indicator of bad faith.

The disputed domain name resolves only to a registrar parking page. Non-use or passive holding does not prevent a finding of bad-faith use. The Panel must assess the totality of the circumstances, including the distinctiveness and reputation of the mark, the composition of the disputed domain name, the absence of any plausible good-faith explanation and the Respondent’s failure to participate in the proceeding. See section 3.3 of the WIPO Overview 3.1 and Telstra Corporation Limited v. Nuclear Marshmallows, WIPO Case No. D2000-0003.

Those factors support a finding of bad faith here. In view of the distinctive and well-known character of the JCDECAUX mark and the deliberate one-letter misspelling, the Panel cannot identify any plausible good-faith use to which the disputed domain name could be put.

The configured MX records reinforce that conclusion because they enable the disputed domain name to be used for email. The

existence of MX records does not, without more, establish that the Respondent has sent deceptive emails. In the circumstances of this case, however, email sent from an address using this typosquatted domain name would carry an obvious risk of impersonation and confusion. Previous CAC panels have treated equivalent circumstances involving the JCDECAUX mark and active MX records as supporting a finding of bad faith. See JCDECAUX SA v. Handi Hariyono, CAC-UDRP Case No. 102827. See also section 3.4 of the WIPO Overview 3.1.

Considering these circumstances cumulatively, the Panel finds, on the balance of probabilities, that the disputed domain name was registered and is being used in bad faith. The Complainant has established the third element of paragraph 4(a) of the Policy.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

- 1. jcbecaux.com: Transferred

PANELLISTS

Name	Jan Schnedler
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DATE OF PANEL DECISION 2026-08-29

Publish the Decision