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**Submission by The Football Association Premier League Limited for the 2023 Review of Notorious Markets for Counterfeiting and Piracy**

**(Docket No. USTR-2023-0009)**

Dear Mr Lee

**Introduction**

The Football Association Premier League Limited (the “**Premier League**”) is the organising body of the top-level football competition for clubs in England and Wales, which is currently known as the Premier League (the “**Competition**”). The Premier League is owned by the 20 constituent member clubs of the Competition from time to time (the “**Clubs**”). The Premier League is authorised by the Clubs to license broadcasters throughout the world to provide and offer audio-visual coverage of the 380 matches that are played in the Competition during the course of each season (“**Matches**”). The Premier League owns copyright in the audio-visual coverage of all Matches, including film works (in the footage) and artistic works (in the various logos and on-screen graphics). The Premier League is broadcast to almost 900 million households around the world (including through NBC Sports, the Premier League’s authorised broadcaster in the United States) and a high proportion of the Premier League’s revenue is generated from the sale of exclusive audio-visual broadcasting rights to the Matches. The United States is a key market for the Premier League, as demonstrated by the recent opening of the Premier League’s New York office<sup>1</sup> and the Summer Series of Premier League matches in July 2023, featuring six Clubs with fixtures across the United States<sup>2</sup>.

The revenue generated from broadcast rights is crucial to the quality and success of the Competition, and for the Premier League’s ability to contribute to community projects around the world. The Premier League has committed to investing £1.6 billion in community and wider football initiatives between the 2022/23 and 2024/25 Seasons and since 2007 has reached 45 markets through its community work, training over 36,000 adults and benefitting almost 2 million young people. In the United States, this has included running Premier League Primary Stars USA, a digital learning programme for elementary schools that has been active across 679 schools in 7 states with approximately 75,000 students involved.

The Premier League welcomes the opportunity to respond to the Office of the United States Trade Representative’s (“**USTR**”) 2023 Review of Notorious Markets for Counterfeiting and Piracy (the “**Notorious Markets List**”). Abuse of the Premier League’s IP rights occurs through many forms, both physical and online. However, due to the scale of infringement, the Premier League has decided to focus on the infringement of its copyright over the internet. During the course of the 2022/23 Season<sup>3</sup> alone the Premier League detected almost 700,000 infringing live streams and removed over 850,000 unauthorized clips of Matches available online around the world.

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<sup>1</sup><https://www.premierleague.com/news/3599181>.

<sup>2</sup> <https://www.premierleague.com/SummerSeries>

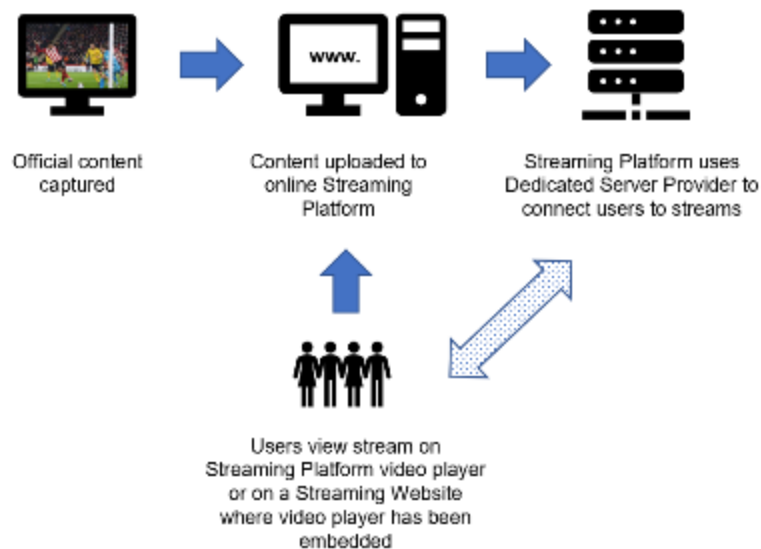
<sup>3</sup> Data based on 38 rounds of Matches taking place between 6 August 2022 and 28 May 2023.

## Online copyright infringement of live sport

Infringement of the Premier League’s copyright has evolved in many ways over several years. The current ecosystem for unauthorised online streaming of Matches can most simply be broken down into: (a) “Open Web Piracy” - where infringing streams of Matches are openly available for free over the internet, although generally at reduced quality; and (b) “Closed Network Piracy” - where infringing streams of Matches are made available by sophisticated operators, at a generally higher quality, to individuals that have purchased the necessary subscriptions from them, either as a one-off fee or a regular subscription.

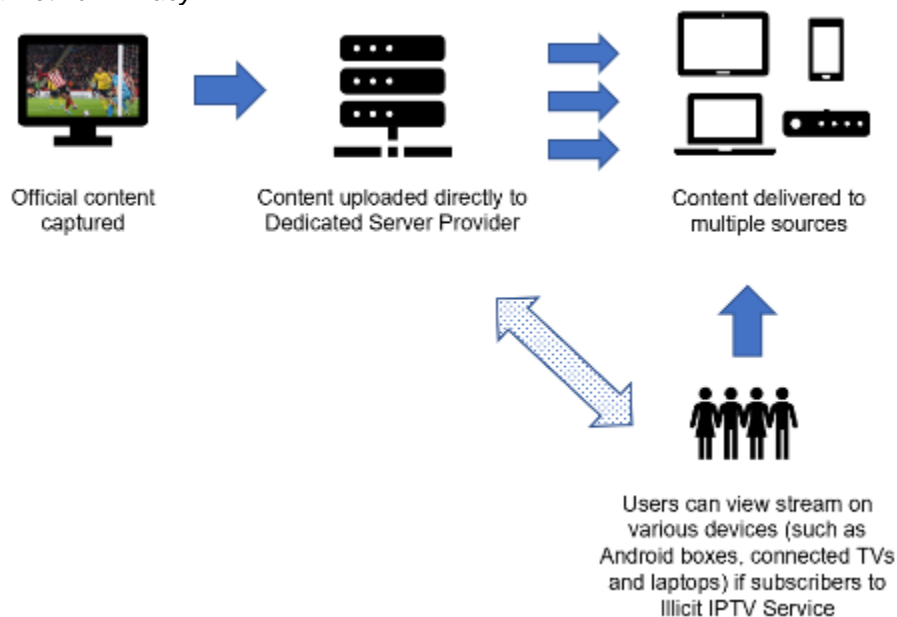
A simplified illustration of how both these forms of online piracy work are below:

Figure 1: Open Web Piracy



Open Web Piracy involves a pirate operator capturing an official broadcast signal (through various means, such as using a HDMI splitter connecting a legitimate set-top-box to a computer) and then uploading the content to a Streaming Platform. The Streaming Platform software creates a hyperlink to the content that may be played within the Streaming Platform and/or extracted and shared for viewing elsewhere on the internet, often on Streaming Websites (also known as linking or referring websites, that are generally free to access and which aggregate URLs from a range of Streaming Platforms and provide hyperlinks to live streams). However, as illustrated by the diagram above, users are unable to connect to streams made available through Streaming Platforms and Streaming Websites without the use of a Dedicated Server Provider (sometimes referred to as a Hosting Provider) to deliver the streams. Without them, users would still be able to access Streaming Platforms and Streaming Websites but would not be able to view the audio-visual content on them.

Figure 2: Closed Network Piracy



Closed Network Piracy also requires a pirate operator to initially access an official broadcast signal. However, in this more sophisticated form of piracy, the operator uploads the content straight on to a streaming server (without the need for a Streaming Platform) and makes the content directly available to certain users. This is generally how Illicit IPTV Services operate; in return for a one-off, monthly or annual fee, they provide access to an Electronic Program Guide (“EPG”), typically through illicit streaming devices such as an Android box, containing hundreds or even thousands of channels of premium content. This is termed a “Closed Network” because the content is only available to users who have paid the pirate operators the relevant subscription. However, just as with Open Web Piracy, the process cannot work without the use of a Dedicated Server Provider to enable those users to connect to the audio-visual content. The EPG would remain accessible, but no content would be played when a relevant channel was selected.

### Recommendations for the Notorious Markets List

Whilst the above is an over-simplification of the piracy ecosystem, it does illustrate the role of several key entities that are directly involved in the offering of illegal live streams of Matches. This submission therefore deliberately focuses on the following intermediaries: Dedicated Server Providers, Streaming Platforms, Streaming Websites, Illicit IPTV Services, and Physical Marketplaces where Illicit IPTV Services are sold. Any internet visit numbers included within the submission are global figures sourced from Similarweb’s traffic analysis tool.<sup>4</sup>

The examples provided are by no means exhaustive. The reality is that many other examples of these and other intermediaries are involved in the wide-scale infringement of live sports content around the world.

## Dedicated Server Providers (“DSPs”)

Without DSPs, users would not be able to watch any infringing audio-visual content regardless of whether they are using Streaming Websites, Illicit IPTV Services or other pirate sources. DSPs are therefore in many ways best-placed to prevent both Open Web and Closed Network piracy from occurring. Several, however, instead choose to profit from such infringements by knowingly leasing their servers to pirate operators.

<sup>4</sup> <https://www.similarweb.com/>



As illustrated by a decision of the District Court of the Hague in the Premier League's civil proceedings against Ecatel Ltd<sup>5</sup>, DSPs are able to act in real-time to remove infringing live streams passing through their networks. They should accordingly be required to (i) offer effective and appropriate takedown tools (which has proved highly effective, straightforward, proportionate and safe whenever implemented); (ii) provide customer identification verification of customers found to be making available copyrighted content without authorisation; and (iii) enforce meaningful repeat infringer policies.

### **Recommended DSPs for inclusion on the Notorious Markets List**

When compiling its list of DSPs for inclusion on the Notorious Markets List, the Premier League has focused on those that have (i) been responsible for some of the highest volumes of infringing live streams of Matches in Season 2022/23 and so far in Season 2023/24<sup>6</sup> (and often for many years); and (ii) not taken any meaningful action to prevent the infringements, either in real-time or subsequently against the infringing customer(s), despite receiving an electronic takedown notice for every infringing stream.

The DSPs referenced in this submission have between them been responsible for tens of thousands of infringing live streams of Matches already during Season 2023/24. Where possible, the Autonomous System Number (ASN) is also included to help identify the correct organisation. ASNs are the numbers that allow identification of each network on the internet.

#### ***Amarutu Technology Ltd ("Amarutu") – AS206264***

Amarutu (also known as Koddos) is a DSP which claims to have office locations in Hong Kong and Seychelles and which operates data centres in the United States and the Netherlands.<sup>7</sup> It consistently ignores the takedown notices it receives from the Premier League every week. Amarutu's attitude to such notices, which it has demonstrated for many years, is illustrated on the offshore dedicated sever page of its website, where it states:

*'Main rules being no childporn, malicious scripts/pages or SPAM on the network, almost all other content is allowed. Abuse and DMCA messages will be forwarded to the client for resolution but in most cases action is not required'*<sup>8</sup>

Amarutu was named in the USTR 2022 Review of Notorious Markets for Counterfeiting and Piracy (the "**2022 Notorious Markets List**")<sup>9</sup> but it has continued to allow large scale infringement of Premier League copyright through its services; during the 2023/24 Season the Premier League has detected over 500 infringing live streams already.

#### ***AS-Istqservers / Istqserveres ("Istq") – AS212042 / AS211826***

Istq claims to be based in Amman, Jordan. Despite having an online abuse reporting form (<https://istqservers.com/abuse.php>) and abuse email address, the Premier League has not seen any action being taken upon receipt of takedown notices. Over 1,300 infringing streams across two associated ASNs have been traced to this DSP during the opening two months of the 2023/24 Premier League Season, in addition to over 7,000 infringing streams being detected on their servers during Season 2022/23.

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<sup>5</sup> *The Football Association Premier League v Ecatel Ltd*, C/09/485400/ HA ZA 15-367 (2018)

<sup>6</sup> The 2023/24 Season began on 11 August 2023

<sup>7</sup> <https://koddos.net/contact.html>

<sup>8</sup> <https://koddos.net/offshore-dedicated-servers.html>

<sup>9</sup> [https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20\(final\).pdf](https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20(final).pdf)



### **HOSTPALACE DATACENTERS LTD GB - AS60064**

HostPalace is not a new DSP – it has been known for many years to the Premier League as a DSP that ignores takedown requests, and during Season 2022/23 it was responsible for over 3,000 infringing live streams. Its latest iteration claims to be based in the UK, but it also has a webpage which states that it has a datacentre in the US.<sup>10</sup> So far during Season 2023/24, it has been responsible for nearly 2,000 infringing live streams, and it has again proven non-responsive to takedown requests.

### **MYWEB Limited – AS60528**

MyWeb plays a role as a DSP and has been responsible for delivering over 100 infringing streams so far during Season 2023/24. As per many of the DSPs in this list, contact details provided are misleading – a country code of Belize is provided alongside an address in Hong Kong<sup>11</sup>.

However, alongside the role of a DSP, MyWeb plays a further role in supporting the piracy ecosystem. In order for a DSP to operate, it must either be a member with a RIR or it needs to be sponsored by an existing member. MyWeb performs this sponsorship role. By sponsoring other infringing DSPs, such as PEENQ.NL and Squitter (both discussed below) it allows these two egregious DSPs to function as delivery servers for infringing streams. The Premier League has previously notified MyWeb of its role in allowing DSPs like Squitter to operate but has received no response to its correspondence.

### **PEENQ.NL – AS212370**

Whilst no infringing streams were detected on PEENQ.NL during the 2022/23 Season, there has since been a rapid rise in infringements detected. In the first two months of Season 2023/24 the Premier League has detected over 8,000 infringing live streams. It does not acknowledge notices or takedown requests. PEENQ.NL has a .nl domain which would suggest operations in the Netherlands, but the website is non-functional. It is registered on RIPE with a country code of India but an address of 'Netherlands'. These misleading contact details are a good example of the wholly inadequate information often provided, making it extremely difficult for rightsholders to locate or contact DSPs about infringement.

### **Squitter Networks – AS213371**

Squitter, also sometimes referred to as ABC Consultancy, is a clear example of the difficulties in identifying and locating those responsible for making infringing content available. Squitter claims to have an office in Saint Petersburg, Russia (<https://squitter.eu/>), but based on its ASN lookup in the RIPE<sup>12</sup> database, the Netherlands is provided as its location. The Premier League's investigations indicate that both locations are false. Over the opening two months of the 2023/24 Premier League Season, over 1,300 infringing live streams have been detected on Squitter's servers, and during Season 2022/23 over 77,000 infringing live streams were detected. Takedown notices are sent for each infringing stream traced to a Squitter server, but the Premier League has not received any responses or seen any action being taken to end the ongoing infringements. The website domain associated with Squitter's abuse address ('abuse@firki.io) even advertises 'DMCA ignored' hosting as a service.

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<sup>10</sup> <https://host-palace.uk/datacenter>

<sup>11</sup> <https://www.ripe.net/membership/indices/data/bz.myweb.html>

<sup>12</sup> DSPs need to be allocated IP addresses by a Regional Internet Registry ("RIR") in order to operate. For this to happen, a DSP must either be a member with an RIR (such as the Réseaux IP Européens Network Coordination Centre, the regional Internet registry for Europe, the Middle East and parts of Central Asia ("RIPE")) or it needs to be sponsored by an existing member, which is where MYWeb Limited's role fits in. DSPs operating in these territories are allocated IP addresses by RIPE, which they use to deliver content on the Internet.



## **Zetnet Ro - AS25198**

Zetnet RO has been responsible for just under 1,500 infringing live streams this season and was responsible for nearly 10,000 over the course of Season 2022/23. Despite receiving takedown requests from the Premier League, it has refused to take action. Zetnet RO has data centres all over Europe, but is registered as a Romanian company.

## **Streaming Platforms**

Streaming Platforms can play an integral role in preventing Open Web Piracy as the removal of infringing content at source results in the content becoming inaccessible on all third-party locations that are embedding or linking to the content.

The below are two examples of particularly problematic and popular Streaming Platforms whose streams are often embedded into the most popular Streaming Websites.

### ***Aliez.me/apl(#).me/aliez.tv (“Aliez”)***

Aliez is a hybrid site that operates as both a Streaming Platform and a user generated upload site, where users can start and stream their own content. The Premier League also understands that this website has close ties with the Russian-based linking site, livetv.sx (see below), where the Premier League frequently sees Aliez streams being shared. Over 3,500 infringing live streams were detected on Aliez over Season 2022/23, and the Premier League has detected over 250 infringing live streams so far in Season 2023/24, with 44% of those delivered by Squitter, one of the most problematic DSPs cited above. 25% of visits to the Aliez.tv domain this season have come from the US – the highest percentage of visits from any single country.

### ***ePlayer***

ePlayer is a streaming platform that operates through a series of suspected domains<sup>13</sup> and enables users to upload streams that can be delivered to viewers embedded in a linking site. During Season 2022/23, the Premier League detected streams being sourced to ePlayer in over 200 different linking sites. For Season 2023/24 the Premier League has already detected nearly 5,000 live streams of Matches from the ePlayer service and the service is completely non-compliant with takedown requests.

### ***Zhuafan/Justmi***

In the Premier League’s submission for the 2022 Notorious Market List, Zhuafan<sup>14</sup> was highlighted as a Chinese user-generated Streaming Platform that offers a mixture of video content, including a large number of unauthorised live streams of Matches. Since that submission, the two main domains associated with the service have gone offline.<sup>15</sup> However, Premier League investigations show that this service has now rebranded as Justmi ([www.justmi.cn](http://www.justmi.cn)). The new site has received an average of approximately 500,000 visits per month since May 2023, with just under 15% of these from consumers in the US, and 55% from consumers in China. Almost 100 infringing live streams have already been detected in the opening few weeks of Season 2023/24.

The platform enables individuals to upload live and on-demand content to the platform, with live streams of Matches indexed and accompanied by commentators / anchors provided by the platform. As well as being indexed and viewable on the platform itself, a large number of Streaming Websites, predominantly within China and Hong Kong, offer separate access to the streams. Justmi ignores all notices from the Premier League.

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<sup>13</sup> ddolahdplay.xyz; superwebplay.xyz; maxisplay.xyz

<sup>14</sup> <https://zhuafan.tech/>

<sup>15</sup> Zhuafan.tech and Zhuafan.co are both currently unavailable.



## Streaming Websites

Streaming Websites offer consumers free access to live streams of Matches and other live events and, according to the Premier League's extensive consumer research, remain the preferred method of pirate consumption in many markets around the world. The following is a non-exhaustive list of Streaming Websites that have ignored all takedown notices sent by the Premier League and are globally popular. All the below websites carry content from US based sports and/or broadcasters.

### ***Freestreams-live1***

A site that was previously operating under the domain 'freestreams-live1.com'. After this domain was seized by Homeland Security Investigations (HSI), a new domain 'freestreams-live1.tv' was setup. The domain continues to be a major source of live pirate content of Matches, with live content directly embedded onto the site. The domain received just under 50 million global traffic visits since October 2022 with the highest traffic from the US.

### ***Livetv***

Livetv.sx (and its associated family of domains including Livetvs.eu) is a Streaming Website that has historically operated through multiple domains to provide an index of links to live streams of a very broad range of sports events, including live Matches. Users can simply select the event they wish to view, click on the relevant link and watch the live stream within the framework of the site. It is available in 12 different languages and received over 129 million global online visits since October 2022. The site is currently the subject of blocking injunctions obtained by the Premier League for copyright infringement in multiple jurisdictions but remains available and popular elsewhere.

### ***Totalsportek***

Totalsportek (previously totalsportek.com and now totalsportek.pro) is a major pirate sports Streaming Website that provides links to multiple live sporting events. The site does not post links until about an hour before each live football match starts and when it does, it provides an index of up to 40 links. The site attracted over 90 million global visits since October 2022. The Premier League believes that this website is operated by an individual in Poland.

### ***VIPBox***

VIPBox (VIPBox.lc and associated domains) is another example of a Streaming Website that provides links to a range of live sporting events from around the world. The Streaming Website further makes content available in multiple languages, including English, Spanish, German and Italian. There are numerous domains operating under the "VIP" brand, and the .lc domain alone received nearly 71 million visits since October 2022. The Premier League believes the website is operated by an individual based in Germany.

### ***Xoilac***

The Xoilac family of websites targets a Vietnamese audience and provides links to a wide range of live sporting content. The websites are some of the most egregious the Premier League has encountered, with infringement continuing on the site despite Vietnamese authorities attempting to block access to domains associated with the service, and widespread news coverage highlighting that the sites are infringing.<sup>16</sup> In total, the operators have created over 300 domains within the Xoilac family to try and avoid disruption efforts. The operators of the site appear to be based in Hanoi, Vietnam and seemingly operate with little concern for enforcement action being taken against them. Since October 2022, the Xoilac family of sites has received approximately 32 million visits.

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<sup>16</sup> <https://danviet.vn/vi-sao-xoilac-tv-vi-pham-ban-guyen-bong-da-gan-5-nam-nhung-khong-bi-xu-ly-triet-de-20230906230851405.htm>, <https://vietnamnet.vn/en/xoi-lac-tv-and-thousands-of-pirated-webs-blocked-by-authorities-2188485.html#:~:text=Authorities%20have%20found%20that%20Xoi,of%20the%20Vietnamese%20football%20squad>



## Illicit IPTV Services

Illicit IPTV services offer unauthorised access to hundreds or even thousands of TV channels illegally sourced from legitimate service providers worldwide. This has allowed Illicit IPTV operators to exploit IP rights in order to offer a much wider range of content than any legitimate broadcaster could, without contributing to any investment in production, rights acquisition or wider economic and community initiatives. The following is a non-exhaustive list of sophisticated Illicit IPTV Services that are brazenly operating in such a way to offer live streams of Matches every week, as well as access to US sporting events and TV channels.

### ***BestBuyIPTV***

BestBuyIPTV is a very popular global IPTV service that carries channels from broadcasters located all around the world, including many that carry Premier League content. Investigations conducted by the Premier League have located the operator of the service in Vietnam. BestBuyIPTV was included in the USTR's 2022 Notorious Markets List.<sup>17</sup>

### ***Chaloos/Forever TV/ Mediastar***

Chaloos is a major source of pirate streams which the Premier League understands is linked to several other prominent piracy operations, including Mediastar (another major source of pirate IPTV streams), and Forever TV (previously 'Forever IPTV', a wholesaler of pirate IPTV channels). These services between them are responsible for the unauthorised provision of thousands of premium TV channels and on-demand movies and TV content. Chaloos was named by the United States Trade Representative ("USTR") on its 2022 Notorious Markets List.<sup>18</sup>

### ***EVPad***

EVPad<sup>19</sup> is an illicit IPTV streaming service that operates through a network of online and physical resellers and is one of the most popular illicit streaming services across South East Asia. It offers content through multiple hardware models that are loaded with apps capable of providing access to thousands of channels. The business is extremely sophisticated and regularly launches new product lines; just one such product purchased on behalf of the Premier League was found to provide access to over 1,700 channels, including 75 offering live sports broadcasts. The operators have been very careful to hide their location and identities, although the Premier League's investigations have linked them to a presence in Hong Kong and China.

### ***Family Box***

The Premier League has detected Family Box streams through its role as an Illicit IPTV service with global coverage, but is also aware that it has a terrestrial pirate operation covering Kurdistan. The offices are in Erbil, Iraq. The Illicit IPTV service makes available a wide range of sports content, including that of US rights holders. It uses Telegram as a way of promoting the wide range of available channels.

### ***Globe IPTV***

Globe IPTV is one of the most prominent wholesalers of content to pirate services around the world, offering access to live sports, movies and television content through over 1,500 channels. It is known to have supplied multiple pirate services that have been the subject of historical and ongoing legal action pursued by the Premier League. Investigations carried out by the Premier League and several other content owners have identified the operator in Lebanon.

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<sup>17</sup> [https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20\(final\).pdf](https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20(final).pdf), p24

<sup>18</sup> <https://ustr.gov/sites/default/files/IssueAreas/IP/2021%20Notorious%20Markets%20List.pdf>, p25

<sup>19</sup> <https://www.evpadpro.com/>





### **Redline**

Redline<sup>20</sup> is a supplier of illicit streaming services which, although headquartered in Turkey (through the company DTS Elektronik Sanayi Ticaret Limited Sirketi), has been operating through a network of online marketplaces, physical distributors and warehouses across Europe, the Middle East and Africa for over 10 years. One of its “Red360 TV” products for example, purchased on behalf of the Premier League, provided a list of almost 5,000 available channels.

### **Spider**

The Premier League is aware that Spider-branded devices are sold across MENA and Europe, via a website<sup>21</sup> and physical shops, by a company based in Jordan. The devices make available a wide range of content, including channels that offer live broadcasts of Matches. We also understand that the website sells subscriptions to unauthorised IPTV services. Spider was included in the USTR’s 2022 Notorious Markets List<sup>22</sup>.

### **SVI Cloud**

SVI Cloud is an illicit streaming device that is very popular in South East Asia. It operates both online and through an extensive list of resellers with over 70 physical locations listed as selling the device on their official website.<sup>23</sup> The devices have also been sold brazenly on popular e-commerce marketplaces. The devices offer content through multiple hardware models that are loaded with the app “Luca TV”, which is capable of providing access to over 1,000 live TV channels. The operators have taken steps to conceal their identities, but the Premier League’s investigations have linked them to a presence in Hong Kong and China.

### **Yacine TV**

Yacine TV provides infringing content through an app popular in the MENA region<sup>24</sup>. The Premier League understands that the service is likely operated from Algeria, and appears to be particularly popular in North Africa. It makes available a range of TV channels that carry live broadcasts of Matches.

## **Physical Marketplaces**

Physical marketplaces pose a piracy issue not just in the sale of devices and services themselves, but also by creating an air of legitimacy around the sale and consumption of pirate content.

In territories where law enforcement authorities have taken action in such marketplaces, it is possible for there to be a swift and large reduction in piracy levels. The notorious Sim Lim square in Singapore provides a clear example of the widespread impact actions like police raids can have<sup>25</sup>. Since the raids, and resultant widespread media coverage, the Premier League has not found any physical shops openly selling illicit streaming devices offering its content in Singapore.

The Premier League would suggest adding the below two physical marketplaces to the Notorious Markets List:

### **Dragon Mart**

We understand Dragon Mart is the largest Chinese wholesale market in the world, located in the International City district of Dubai. There are dozens of shops selling receivers and IPTV apps enabled for piracy, many of which provide access to channels that offer live broadcasts of Matches. These services are sold openly, and the market is infamous as a location in which such products can be purchased.

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<sup>20</sup> <https://redline.com.tr/en/>

<sup>21</sup> <http://spiderreceiver.com>

<sup>22</sup> [https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20\(final\).pdf](https://ustr.gov/sites/default/files/2023-01/2022%20Notorious%20Markets%20List%20(final).pdf), p34

<sup>23</sup> <https://www.svicloud.net/en/news.html>

<sup>24</sup> <http://download.yacineapp.tv/>

<sup>25</sup> <https://www.channelnewsasia.com/singapore/police-illegal-streaming-devices-sim-lim-set-top-boxes-pirate-bootleg-2993921>



### ***Feira dos Importados***

The two popular marketplaces in Brazil both known as “Feira dos Importados”, one in the heart of Brasilia<sup>26</sup> and one just to the south in the district of Taguatinga<sup>27</sup> are famous centres for electronic stores. A recent visit by Premier League investigators to the two marketplaces found more than 25 shops offering Illicit IPTV Services that provide access to a wide range of content, including Matches. These are sold loaded with infringing apps, and sellers are open about the provision of access to infringing content. There is a mix of devices sold with either 1 year subscriptions or unlimited access to pirate content.

## **Conclusion**

As demonstrated throughout this submission, IP infringement through online piracy is a complex issue that involves many different intermediaries and forms of technology. The entities identified above, however, are all playing an integral role in the direct offering of high volumes of infringing live streams of Matches (as well as, in many cases, other copyright protected content) and are therefore recommended for inclusion on the Notorious Market List.

The Premier League would be happy to assist the USTR with more detailed commentary on any of the countries covered within this submission.

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<sup>26</sup> <https://www.feirabrasilia.com.br/>

<sup>27</sup> <https://www.feiradetaguatinga.com/>