



October 1st, 2025

Mr. Daniel Lee
Assistant U.S. Trade Representative for Innovation and Intellectual Property
Office of the United States Trade Representative
600 17th St., NW
Washington, DC 20508

**Submission by beIN Media Group LLC and Miramax, LLC
2025 Review of Notorious Markets for Counterfeiting and Piracy**

Docket Number USTR-2025-0018

Dear Mr. Lee,

beIN Media Group LLC ("beIN") and Miramax, LLC ("Miramax") appreciate the opportunity to provide comments in response to the request by the Office of the United States Trade Representative ("USTR") to identify examples of online and physical notorious markets that engage in and facilitate substantial copyright piracy and trademark counterfeiting, for the purposes of USTR's 2025 Review of Notorious Markets for Counterfeiting and Piracy.

beIN is a global sports and entertainment media company incorporated under the laws of the State of Qatar. beIN engages in television production, distribution and media rights acquisition, and broadcasts in 43 countries across North America, France, Turkey, the Middle East and North Africa ("MENA"), and Asia. beIN has also invested substantially into entertainment through television production and distribution, and owns a majority share of Miramax Films. Since 2022, beIN has also been operating an OTT service in MENA and Turkey known as "TOD", which includes Arabic and Turkish language original entertainment productions, as well as exclusively-licensed content.

During the past year, beIN has held exclusive rights to broadcast, and to authorize others to broadcast, premium US sporting competitions in the MENA region, including but not limited to the National Basketball Association ("NBA"), Major League Baseball ("MLB"), the US Open Tennis Championships, as well as major international sporting competitions such as the Champions League by the Union of European Football Associations ("UEFA"), and national soccer leagues. beIN also holds the rights for the 2026 FIFA World Cup in MENA."

The core of beIN's business is dependent on intellectual property ("IP") rights that result both from having acquired exclusive media rights from third parties, such as major sporting leagues (including many based in the US), and from beIN's own efforts as the creator of media content. beIN's negotiations to acquire broadcast rights from major US and international sporting

leagues have been underpinned by a necessary confidence in international IP protection. Accordingly, the protection and enforcement of those IP rights is fundamental to the health and success not only of beIN and the rights holder sporting leagues themselves, but also of the many people in the United States, and around the world, whose livelihoods are dependent on the revenue that this industry generates.

Miramax is a global film and television studio headquartered in Los Angeles, California. Miramax is known for films such as *Good Will Hunting*, *13 Going on 30*, *Kill Bill*, and *Halloween* (and its sequels), with more recent releases including *Bridget Jones: Mad About the Boy*, *The Beekeeper*, and *The Holdovers*, among many others. Miramax is also the global television and digital distributor for Revolution Studios (“Revolution”), holding worldwide rights to Revolution’s films. Revolution had previously acquired some of its titles from Morgan Creek Entertainment Group (“Morgan Creek”), and Miramax now represents these titles as well retaining worldwide television and digital rights, excluding North America. Miramax was acquired by beIN in March 2016 and, since December 2019, has been jointly owned with ViacomCBS (now Paramount Global), which holds a 49% stake.

Piracy presents a serious threat to the broadcasting, film, and television industry. In the MENA region in particular, where beIN broadcasts directly to customers via its own encrypted satellite channels (in Arabic, English, and French) and an OTT (over-the top) service directly via the Internet (beIN Connect, and since 2022, an OTT service known as “TOD”), piracy is likely the principal means in many countries by which consumers access premium television content, including live sports broadcasts. Piracy is also likely the primary means in many countries in the MENA region by which consumers access premium movie and television content on demand, including content owned by Miramax. Indeed, there are many well-established pirate operators, and well-known piracy “brands,” that are openly sold in physical and online markets in countries across the MENA region.

In many respects the piracy in MENA is occurring in a far more widespread, and open way, than is seen in most other parts of the world, and so represents a particularly acute threat to the sustainability and growth potential for the audio-visual sector in the region.

beIN and Miramax are fully committed to the fight against piracy through all available technological and legal means. We are pleased to say that some of the services referred to in our previous USTR submissions have now ceased operating.

We therefore welcome USTR's publication of key online and physical marketplaces that are involved in infringements of IP rights, and commend its aim to encourage the licensed distribution of legitimate content. beIN and Miramax’s submission sets out a number of these which should be considered for inclusion in the Notorious Markets report.

beIN and Miramax particularly welcome the ‘issue focus’ for the 2025 Notorious Markets List on copyright piracy of sports broadcasts. In this year’s submission, we have also included a section addressing this focus, drawing on our experience as a world leading sports broadcaster.

Iraq

Iraq is a regional hub for IPTV piracy, where major licensed Internet Service Providers (ISPs) and distributors openly own, operate, and/or distribute sophisticated pirate platforms. Piracy in Iraq is systemic, organized, and in many cases integrated into the core ISP business model with the provision of virtually unlimited and free (or ultra-low-cost) pirated content serving as an effective value-added-service (VAS) for ISP subscribers.

These pirate services operate on a **commercial scale**, competing directly with legitimate pay-TV operators, and serve **millions of subscribers across Iraq and neighboring MENA markets**. Piracy platforms such as **MyTV+, Vodu, Veo, Cinemana, Cee and Cinema Box** are not independent actors but are instead offered **as an integral part of broadband internet packages**, making piracy a default feature of connectivity.

The **biggest offenders** are **Newroz Telecom / Fast Group** and **Earthlink Group**, with additional facilitation by **Shams Telecom, Halasat** and **HRiNS**. These ISPs are not merely tolerating piracy but are directly responsible for operating and monetizing it.

The harm to U.S. rights holders would be **severe and measurable**. We are aware of many high-value and prestigious American sports and entertainment properties — including the **UFC, NFL, NBA, PGA Tour, major US studios including Netflix, Paramount, Warner Brothers** having their content made available on piracy services in Iraq. The widespread availability of these premium U.S. sports leagues and entertainment content on ISP-backed piracy services would likely be depriving rightsholders of legitimate revenue – estimated by independent sources to be north of \$1 billion per year¹, but also entrenches consumer reliance on piracy across the region.

There are also several other pirate entities operating from Iraq, including:

- ***Chaloos / Mediastar / Forever TV***

The Chaloos company, which is based in Erbil, Iraq, is a major source of piracy, including, of beIN and Miramax content. The Chaloos company owns and distributes Mediastar branded receivers which enable IPTV and control word sharing piracy. Among many other channels, they provide access to pirated beIN content.

Mediastar (*mediastar.co*), which is owned by Chaloos operates shops that sell household appliances and “Mediastar” branded receivers across Iraq. Mediastar receivers are also sold in Iraq from Chaloos electronics goods store.

More generally, Mediastar receivers are distributed and sold all across the MENA region, and are one of the major well known piracy receiver “brands”. Mediastar receivers are one of the brands of receivers which are commonly sold through physical outlets in MENA (including at the physical markets places referred to above).

Mediastar receivers are commonly pre-loaded with an IPTV app formerly known as Forever IPTV, which in 2022 was renamed “Forever TV”.

¹ Nagra and The Streaming Lab submissions to the Iraq Without Piracy Summit in February 2025

Forever TV provides access to thousands of on-demand movies and television shows, including content owned by Miramax. For example, the following US channels are available on Forever TV: ABC News, CBS, CNN, Discovery, Disney, ESPN, FOX, HBO, and MTV.

In addition to being made available on Mediastar devices, Forever TV also operates from a website at <https://foreveriptv.net/>. The website offers plans for direct customers for as little as US\$38 per year, as well as options to operate as re-streamer and re-seller of the Forever TV service.

Investigations have shown that the operations of Forever TV is closely linked to Mediastar and the Chalooos company.

- ***Family Box***

Family Box operates from Erbil, Iraq, and is one of the most significant pirate operations in the MENA region. It operates both a localized network and is a source of pirate streams consumed within Iraq, and also distributed on other pirate services throughout the MENA region and beyond. In fact, beIN estimates that around 1/3 of all pirated beIN channels seen on pirate IPTV services have originated with the Family Box's operations.

beIN is able to draw this conclusion from the fact that Family Box uses a "Family" logo, which it applies to streams that originate from the operations. These have been seen on a very high proportion of pirated beIN channels on pirate IPTV services monitored by beIN throughout the region and internationally, and indicates that Family Box is likely the source of these pirated streams, which are either directly supplied to other pirate IPTV services, or subsequently re-streamed across the internet. The high quality and reliability of these streams, aided by the sophisticated nature of the Family's Box's operations (in circumventing antipiracy measures and distribution) is likely a contributing factor to the preponderance of the Family Box as a source.

Video-on-demand content on the Family Box's IPTV network includes approximately 20,000 movies. Family Box makes available beIN channels, as well as other international and US rights holders' content.

- ***iStar***

iStar Media ("iStar") is a receiver brand also operating out of Erbil, Iraq. iStar receivers are typically enabled for satellite and IPTV piracy, and iStar also operates a localized network with pirated content. iStar sells iStar-branded receivers that come with a 12-month subscription to the pirate IPTV app "Online TV."

This service provides access to pirated television channels, including beIN channels, as well as pirated VOD content, including Miramax content.

On September 21, 2021, Colorado-based DISH Network, supported by the International Broadcaster Coalition Against Piracy ("IBCAP"), launched a copyright infringement claim in US federal district court against iStar Company, the operator of the iStar IPTV service and its

affiliated entities and individuals. That action resulted in damages orders and broad injunctions in respect of iStar in the US.²

Jordan

Jordan is another market in which piracy is entrenched, and where piracy is conducted openly. Attempts by rights owners, including beIN, to take legal action against this brazen piracy have been unsuccessful, and have exposed serious shortcomings in the country's copyright enforcement regime. One of the most notorious entities associated with piracy is the Spider company, based in Amman, Jordan. Spider distributes Spider-branded devices across the MENA region and Europe, either via online sales (including at <https://spider-receiver.com/>) or from physical shops. The Spider brand is very well known in Jordan, and further across MENA.

Spider receivers are typically supplied preloaded with pirate IPTV apps with 10 year subscriptions costing as little as US\$25-\$100, which include *IPFOX*, *Speed TV*, *Golden IPTV*, *MYHD IPTV*, *Echoo IPTV*, *Bravo IPTV*, *Aroma TV*, *Forever TV*, *Turbo TV* & *LionZ TV*. All of these apps offer access to pirated beIN channels, as well as content from Miramax, and many other US and international content owners. For example, Golden IPTV provides access to, amongst others, the following US channels: Cartoon Network, CBS, Discovery, Disney, ESPN, FOX, HBO, MTV, National Geographic, NBA HD and NBC. Screenshots of US ESPN Sports channels showing content from the 2024 MLB available on a Spider device are included below:

In addition to sales from physical outlets in Jordan and other MENA countries, Spider is also extensively marketed and sold online.

In 2018, Colorado-based DISH Network LLC, filed a copyright infringement action in a US federal district court against the US distributors of Spider IPTV devices.³ DISH Network was successful in obtaining damages from Spider's US distributors, as well as a permanent injunction prohibiting the US distributors from distributing or otherwise infringing DISH Network's exclusive rights in the United States.

In addition to Spider there are several other popular receiver brands which are sold preloaded with pirate IPTV apps in Jordan, including *Gazal*, *Majestic*, and *Professor*.

UAE

While in many markets, the distribution of pirate IPTV services occurs online and/or "underground" (with apps being made available from "unofficial" app stores, websites, or otherwise distributed through less formal means (such as through messaging groups and local networks), in many countries across MENA the piracy is far more in the open and conducted in a manner that appears "legitimate". For instance, it is common in many MENA countries for set top boxes and other media receivers preloaded with pirate IPTV apps to be openly sold from local electronics and satellite shops.

The **Dragon Mart** located in the United Arab Emirates is a notorious physical marketplace where pirate IPTV services are openly sold from shops. This is the largest Chinese wholesale

² <https://www.globenewswire.com/en/news-release/2022/11/07/2549948/0/en/IBCAP-Coordinated-Lawsuit-Results-in-Massive-Takedown-Ruling-Against-iStar-Pirate-Service-iStar-CEO-Ordered-to-Personally-Pay-15-7-Million.html>

³ <https://about.dish.com/news-releases?item=123321>

market in the world outside China. It is located in the international city district of Dubai, and is home to over 6,000 stores selling a wide variety of products, including furniture, home appliances, electronics, clothing and souvenirs. It is popular with locals and tourists alike. It attracts an average of 100,000 visitors per day, with an annual turnover said to be over US\$50 billion.

The electronics section of the market contains *dozens* of shops which sell receivers and IPTV apps enabled for TV piracy. The sellers do not make any efforts to conceal the piracy products on offer, and they are openly sold to customers. The market is a well-known place to buy such products. beIN is aware that some action was taken by local law enforcement against illegal sellers in the Dragon Mart in May 2024. However, subsequent visits to the Dragon Mart have unfortunately indicated that there has been no appreciable reduction in the availability of TV piracy.

Pirate IPTV services are sold pre-loaded on generic android devices, or as a standalone product. The price for a one-year subscription to a pirate IPTV service is typically between AED 130 to 450 AED (approx. US\$35 to US\$120). These services all typically provide access to 1000s of pirate live TV channels and on demand content (including beIN, Miramax, and US rights owners' content). The products on offer include many of the brands of receivers associated with piracy, and pirate IPTV services detailed further below in this submission.

Cambodia

A lax approach to enforcement can also be manifested through the proliferation of piracy services in the business to business market for audio-visual services. For example, in **Cambodia**, beIN is aware of a number of operators that supply pirated television channels, including beIN, US and other local and international content to the hotel market and serviced apartments. These operators, including **Cambodia Digital TV Co Ltd** (a joint venture between Yunnan Media Group and National Television of Cambodia), and **Phnom Penh Cable Television** (one of the major cable TV services in Cambodia), supply channels to both serviced apartments and international hotel chains for guests to watch channels within the rooms and other public areas. Weak enforcement laws in the country make it very difficult for rights owners to prevent this, and means legitimate licensed B2B operators cannot viably enter market.

China

One of the key entities behind much of the piracy impacting the MENA market is a Chinese company, known as **Gotech** (Zhuhai Gotech Intelligent Technology Co., Ltd.)

Gotech is a Chinese white-label Set-top-box manufacturer and operator behind two major piracy operations: the *Forever/Apollo Internet Key Sharing (IKS) service* and the *Apollo IPTV* platform. Together, these services allow users across the Middle East and North Africa (MENA) to illegally access premium satellite broadcasts and online streams, including US content.

IKS piracy works by hacking encryption keys—known as “Control Words”—from legitimate satellite signals and distributing them online. Users with Gotech-enabled receivers can then watch encrypted pay-TV channels without authorization.

- Forever/Apollo IKS is one of the largest such services and remains active despite countermeasures.
- Gotech receivers are often sold with a one-year IKS subscription preloaded, with renewals available online, on social media, and even on platforms such as Alibaba.
- This system is especially popular in MENA.

In addition to IKS piracy, Gotech distributes the *Apollo* IPTV app, preloaded on its various white-label devices. Apollo IPTV provides thousands of pirated live TV channels and on-demand content, including:

- beIN SPORTS channels (including US-licensed sports rights)
- US networks such as CBS, Disney, HBO, MTV, and National Geographic
- Films and series from Miramax and other rights holders

By operating both Forever/Apollo IKS and Apollo IPTV, Gotech enables and profits from large-scale piracy across MENA. Its activities undermine licensed broadcasters, damage the market for US content, and entrench piracy as a mainstream alternative to legitimate services.

Live Sports Broadcast piracy ecosystem

Given the focus of this year report, on piracy of sports broadcasts, beIN and Miramax would like to offer the following information, which we consider the USTR will find useful.

While there are many thousands of websites offering pirated sports content, we would like to draw the USTR's attention to our analysis, which shows some of the key entities that are involved in facilitating this piracy. In our view, while much attention is often directed to individual websites offering pirate content, this is not always the best way to seek to tackle the problem. The website landscape can be very fluid, with new domains and websites continuously being created, often in order to evade enforcement. Regrettably, the structure and nature of the internet means this is relatively easy, and the task of enforcing against individual websites extremely challenging.

Rather, we propose that considerably more focus should be directed to identifying and engaging with the entities which provide the services that facilitate this piracy ecosystem, and in particular the following:

- **Hosting companies, and Regional Internet Registrars**

Companies known as “hosting providers” or “dedicated server providers” are central to the piracy problem because they make it possible for pirates to operate online. Without such hosting, pirates would be unable to distribute their content. beIN, like many owners of live sports broadcast content, routinely monitors the internet to identify these providers by using publicly available databases managed by regional internet authorities. Once identified, formal requests notifying of illicit content and to “take down” are sent to these companies.

Many countries, have laws like the United States Digital Millennium Copyright Act (DMCA) which regulates the process of notifying hosting companies that they are facilitating copyright infringement, and the liabilities which attach to both parties, including where there is non-compliance by a hosting provider. Many of the hosting companies that beIN contacts act upon the notices. However, in recent years there has been a huge shift towards pirates

utilizing hosting services calling themselves off-shore or “bulletproof”, which ignore these requests.

About 80% of piracy activity beIN observes across of broad portfolio of sports rights (including US sports content) is concentrated around a small number of such off-shore hosting companies. These companies typically mask their true locations and identities, making them difficult to track and take legal action.

To set up as a hosting provider, three basic elements are needed:

1. An internet identification number known as an Autonomous System Number (ASN),
2. IP addresses,
3. Servers, which are usually rented from data centers.

Organizations managing these resources, like RIPE NCC in Europe, assign the ASNs and IP addresses. RIPE NCC requests its members or those who use RIPE NCC resources to provide accurate contact information. Some rogue providers abuse this system by posting false or incomplete information. This prevents rights owners and authorities from reaching them or successfully sending takedown notices. The email addresses are often fake or unmonitored, and business addresses are false or shared locations with many tenants, making it impossible to identify the true operators' locations.

In other words, the very concept of an offshore or bulletproof hosting provider seeks to rely on the ease by which this registration system can be misused through the provision of false or incomplete information.

RIPE NCC was established in 1992 to manage the distribution of Internet numbering resources in Europe, the Middle East, and parts of Central Asia. It operates under community governance, who sets its policies and procedures. It is the community's responsibility to maintain up-to-date and accurate contact information; however, this has led to a small number of bad actors abusing this process. IP brokers and RIPE members who want to remain anonymous, enter information that cannot be used to identify the true entity responsible for the RIPE resource. Despite these issues being raised to RIPE NCC and the community, the community have rejected calls for the database to have accurate contactable information. Poor governance and a non-existent know your customer allow bad actors to misuse the internet for illegal activity, including piracy and distributing harmful content.

Below is a list of Hosting providers responsible for making available infringing content and providing services to Live Streaming Piracy-As-A-Service:

- IPv4SuperHub – ASN 209178 – Hong Kong
- Private Layer - ASN 51852 - Panama
- IP Connect Inc – ASN 213373 - Seychelles
- Netulu Incorporated – ASN 215740 - USA
- Cloud Wall Ltd. – ASN 58294 - Bulgaria

beIN also includes the hosting provider Virtual Systems – AS30860 - Ukraine

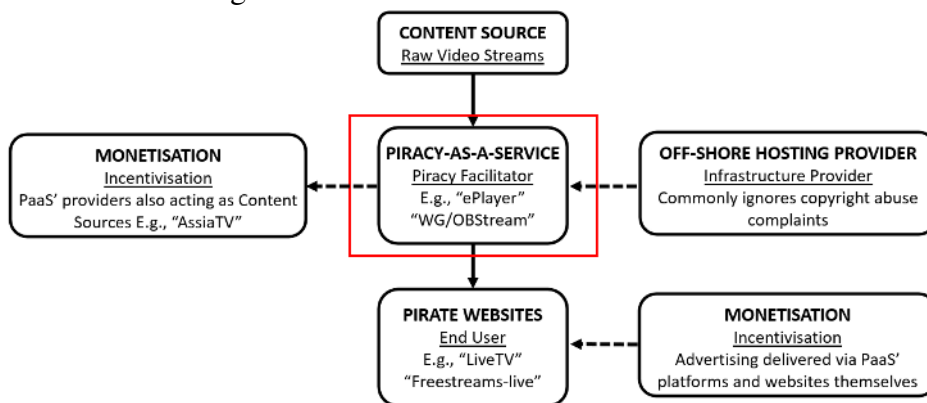
Virtual Systems, a Ukraine-based company registered with RIPE NCC, is a major distributor of infringing content, despite openly publishing its address and ownership details. While clearly operating from a non-offshore location, the company markets itself as an 'offshore VPS hosting' provider, explicitly promoting its lax content policies for streaming, adult, and gambling sites. The company demonstrates a clear lack of cooperation with rights holders, consistently ignoring the thousands of takedown notices it receives.

Live Streaming “Piracy-As-A-Service” Providers

While attention often focuses on the network of websites that directly stream pirated content, beIN and Miramax’s analysis has shown that in addition to the crucial role played by hosting providers, the illicit live sports ecosystem is also highly dependent on a small number of "Piracy-as-a-Service" (PaaS) providers.

These PaaS providers are the unseen enablers, offering bad actors the technical infrastructure to deliver infringing content. Their services, which may include the direct supply of video streams, the use of ‘off-shore’ hosting to evade abuse complaints, and the constant acquisition of new domain names to bypass site-blocking, are designed to ensure a high degree of anonymity and secrecy. This makes it difficult to enforce against and to trace those responsible for tens of thousands of infringements.

The diagram below displays how the PaaS’ facilitators sit at the center of the illicit Open-Web live streaming environment:



According to our monitoring, these few actors facilitated over 5,500 direct infringements of major North American sports content (MLB, NBA, NFL, NHL) between January 1st and August 3rd, 2025. These infringements were the source material for over 270 distinct pirate website domains, which collectively generated 3.2 billion global visits between July 2024 and June 2025. Below are four of the major PaaS entities facilitating piracy of global sports broadcasts:

- ePlayer
- Aliez
- WG/OBStream
- Cast/Hoca

beIN recommends that the USTR add these to its Notorious Markets list for 2025.