



October 7, 2022

Ms. Ariel Gordon
Director for Innovation & 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
2022 Out-of-Cycle Review of Notorious Markets
(Docket Number USTR-2022-0010)**

Dear Ms. Gordon,

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 2022 Out-of-Cycle Review of Notorious Markets.

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, Europe, the Middle East and North Africa (“MENA”), and Asia. beIN has also expanded significantly into entertainment through television production and distribution, and currently owns a majority share of Miramax Films to grow its movie production capabilities.

During the past year, beIN has held exclusive rights to broadcast, and to authorize others to broadcast, premium sporting competitions in the MENA region, including but not limited to the 2022 Beijing Olympic Games, the National Basketball Association (“NBA”), Major League Baseball (“MLB”), the US Open Tennis Championships, the Champions League by the Union of European Football Associations (“UEFA”), and national soccer leagues. beIN is also the Official Broadcaster for the Soccer World Cup by Fédération Internationale de Football Association (“FIFA”) to be held in Qatar in 2022.

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, 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 whose livelihoods are dependent on the revenue that this industry generates.

Miramax is a global film and television studio headquartered in Los Angeles, CA. Miramax is known for films such as Good Will Hunting, 13 Going on 30, Kill Bill, Halloween (and its sequels), The Gentlemen, Uncle Frank, City of Lies, Wrath of Man, and many others. Miramax is also the sales agent for the production company Revolution Films (“Revolution”) and has worldwide television and digital distribution rights for Revolution’s films. Revolution acquired some of its titles from the library of the Morgan Creek Entertainment Group (“Morgan Creek”) several years ago and Miramax now represents these titles, having television and digital distribution rights worldwide, excluding North America. Miramax was acquired by beIN in March 2016, and, since December 2019, has been 49 percent owned by ViacomCBS.

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), 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.

beIN and Miramax are fully committed to the fight against piracy through all available technological and legal means. 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.

In this year’s submission, beIN and Miramax have focused exclusively on Internet Protocol Television (“IPTV”)-based piracy, identifying a number of key pirate IPTV services through which large amounts of pirated content, including US content, is made available. The list of IPTV services provided below is not meant to be comprehensive. While there are numerous other pirate IPTV services, including in the MENA region, beIN and Miramax have focused this submission on identifying some of the most egregious IPTV pirates that have a negative impact on our business, and that of our US licensors.

Other pirate services and facilitators thereof such as: (i) streaming websites, (ii) e-commerce platforms, and (iii) social media and messaging platforms, which were detailed in beIN and Miramax’s prior Notorious Markets submissions, continue to be a threat to the broadcasting and film industry.

MENA-based Pirate IPTV Services

As the US Government is fully aware, there has been a significant surge in IPTV-based piracy, which poses a major threat to the entire broadcasting and film industry. IPTV pirate services typically provide access to thousands of pirated television channels restreamed from around the

world, and vast libraries of on-demand movies and television series. Access to the pirated content is generally provided by means of an application (“app”), which can be (i) installed on consumer hardware (often referred to as an “illicit streaming device” or “ISD”), such as an android device that can be plugged into a television, or (ii) downloaded directly to a user’s own device, such as a smart TV, smartphone, tablet, game console, or similar device. IPTV services are typically either monetized via advertising, or offered on a subscription basis at prices (e.g., USD 35 per year) that are far lower than any legitimate operator acquiring rights to, and producing such content, could ever offer (assuming it were even possible to obtain a worldwide licence to thousands of major television channels, movies, and television series).

IPTV piracy is particularly pernicious because pirated services compete directly with legitimate services. As pirated content can easily be watched through a television, it is likely to engage an entire household and may be considered a true alternative to a legitimate service. Many consumers may even be unaware that the service they use is illegitimate.

Unlike other major forms of internet streaming piracy, such as online content sharing platforms and streaming websites, which are generally relatively easy to discover and monitor on the open internet (with the exception of closed and private groups), pirate IPTV is quite difficult to monitor because it is usually subscription based.¹ This means that the content within a pirate IPTV service can be viewed only if a subscription is purchased and maintained. It requires a substantial undertaking to discover and monitor these services, consisting of both online and “on the ground” monitoring and investigations.

Furthermore, the pirate IPTV “eco-system” is very sophisticated, and complex. There can be various actors and layers between the pirate who first copies the television channel or content, and the ultimate consumer of the pirated content. These actors/layers include:

- Content sources / wholesale channel sellers – pirates who copy the content (a process that involves breaking the technical measures intended to protect that content from illegal re-streaming), and supply the channels to other pirates. It can be very difficult to identify these content sourcing pirates. Given the rigorous technical measures that beIN utilizes to protect our content, beIN believes it is likely that the original content sources of beIN channels are relatively limited. However, given that streams can be replicated and re-streamed infinitely in digital environments, a limited number of entities are able to supply a very large ecosystem of IPTV piracy.
- Aggregators – pirates that package together a number of pirated television channels and content, which they typically make available to re-streamers and re-sellers.
- Re-streamers / re-sellers – pirates that offer consumers subscriptions to pirate IPTV services, and typically also offer “re-seller” schemes, whereby other pirates can market and re-sell these same packages (either re-labelled so they appear to be a different service, or under the same name).

¹ Advertising-supported “open” pirate IPTV apps also exist.

- Branded device distributors – In the MENA region, a number of well-known and established brands and producers of devices, which are pre-loaded with pirate IPTV apps, are sold to consumers. These make accessing the pirated content a “plug and play” experience for the ultimate consumer. However, increasingly, consumers appear to be accessing pirate content by means of apps which they download (from both official and “un-official” app stores, or other places) and then use on their own pre-existing devices.

We note that a particular pirate may serve in one or more of these different roles.

The ecosystem described above is, to a large extent, facilitated by the pirate’s use of what is known as “IPTV panels,” which provide a ready means for pirates to manage distribution and access to the pirated channels and content. An example of a popular IPTV panel known to be used for piracy is Xtream-UI (see: <https://xtream-ui.org>). Recently, the use of IPTV panels has also given rise to a serious and rapidly growing problem comprising the distribution of IPTV playlists. These playlists are a type of file that facilitates access to pirate IPTV channels, which are generated by an IPTV panel. They are designed to work with various “generic” media players, which are not necessarily overtly distributed for the purpose of piracy, but which are able to access the playlists. Most commonly, the playlists are temporary, ceasing to function within a media player in a matter of days. They are typically distributed as a promotional tool by pirate IPTV resellers, but are now very commonly distributed online.

These temporary playlists have, in recent years, been distributed online by a number of sources. This has become a very popular means to access pirate sports content, in particular, given that the playlists are available shortly before games commence. Some of the fora dedicated to sharing these illegal IPTV playlists, and which are notorious for piracy, include:

- <https://iptvlistm3u.com/>
- <https://m.tousecurity.com/>
- <https://usa.m3u iptv.com/>
- <https://artiptv.net/>
- <https://www.dailyiptvlist.com/>
- <http://iptvhit.com/freeiptv>
- <https://best.freeiptv.life/>
- <https://www.iptvsource.com><https://m3u.bestfreeiptv.com/>
- <https://dwdvb.com/all-country-free-iptv-channel-links-m3u-playlis-2022/>
- <https://talysports.com/free-iptv-channel-links-m3u-playlist/>

The sophistication and complexity of the networks involved can make it very difficult to penetrate and investigate the landscape of actors involved in pirating from a content owner. Nevertheless, within the MENA region, based on our extensive investigations, beIN and Miramax are aware of a number of “notorious” pirate actors. Each of these actors is believed to be a significant player in the piracy ecosystem described above.

beIN and Miramax respectfully request that these pirate entities be named on USTR’s 2022 Notorious Markets List, and that Chaloos, iStar, Shabakaty, and Spider, which were included in USTR’s 2021 Notorious Markets List, remain on the Notorious Markets List for 2022.

In the discussion below, we first list and describe the four pirate IPTV services that we request remain on the Notorious Markets List for 2022, Chaloos, Shabakaty, iStar, and Spider. Next, we list (in alphabetical order) the pirate IPTV services that we request be added to this year's Notorious Markets List, namely Dream TV, Family Box, Icone /GoGo IPTV, Redline/Red IPTV, Renbow TV/Cobra IPTV, Starsat/Geant/Apollo IPTV, Tiger, Fosto IPTV, and Yacine TV.

Chaloos / Mediastar / Forever IPTV

The Chaloos company, which is based in Erbil, Iraq, is a major source of piracy, including, in particular, piracy of beIN and Miramax content. Chaloos has been linked to several piracy operations, including Mediastar (a supplier of pirate TV receivers and a major “source” of IPTV pirate streams), Forever IPTV (a wholesaler of pirate IPTV channels into international markets), and Livedream (an operator of a local network in Northern Iraq, providing unauthorized access to beIN, OSN, Discovery, BBC, and other channels).

Most recently, in 2021, USTR included Chaloos on its Notorious Markets List, and recognized that Chaloos reportedly owns and operates Mediastar and Forever IPTV. Since then, there have been no improvements, and Chaloos continues to pirate beIN and Miramax channels and distribute them via its IPTV services. beIN and Miramax therefore request that Chaloos remain on the Notorious Markets List for 2022.

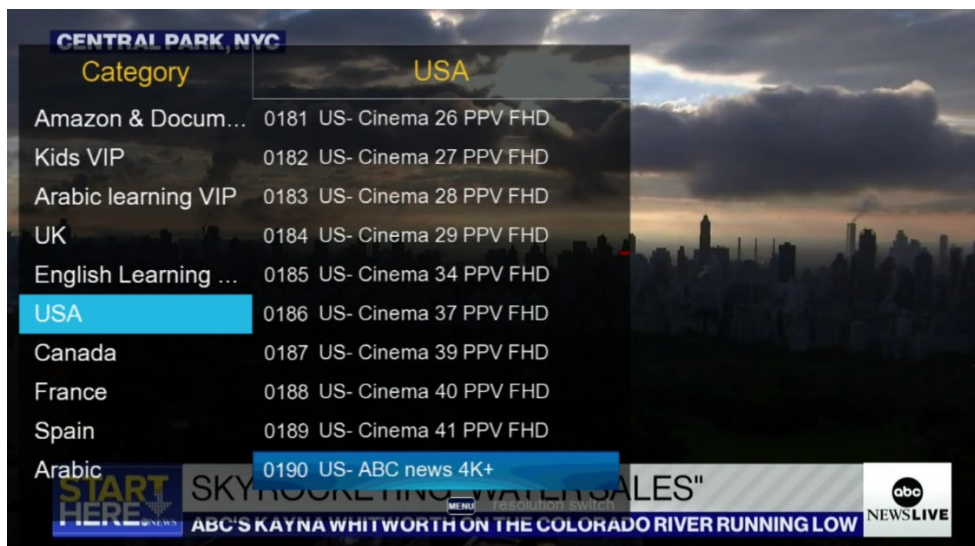
Mediastar (*mediastar.co*), which is owned by Chaloos and based out of Northern Iraq, operates shops that sell household appliances and “Mediastar” branded receivers across Iraq. Mediastar receivers, which are manufactured by Aloys (South Korea), enable IPTV and control word sharing piracy. Among many other channels, they provide access to pirated beIN content.

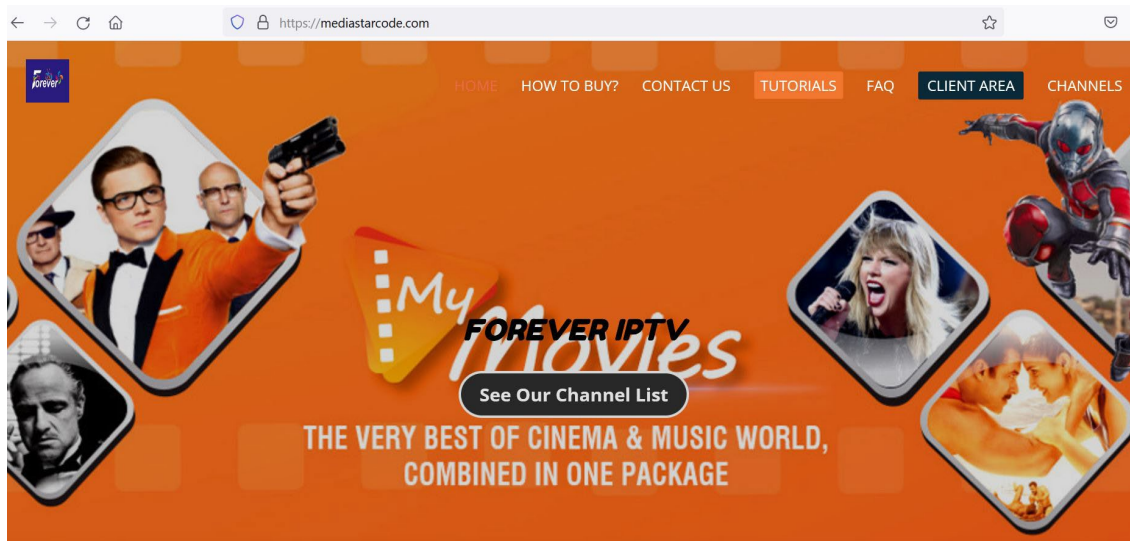
Mediastar shop in As Sulaymaniyah, Iraq





Forever IPTV, another pirate with links to Mediastar and Chaloos, is a wholesaler of pirate IPTV channels that offers to supply pirated channels to IPTV resellers. Forever IPTV 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 IPTV: ABC News, CBS, CNN, Discovery, Disney, ESPN, FOX, HBO, and MTV. Screenshots of ABC News and ESPN being made available on Forever IPTV are provided below:





Investigations clearly link Forever IPTV to Mediastar, and analysis of the logos on pirated channels supplied through Forever IPTV further evidence its link to Mediastar and Chaloos. For example, Mediastar advertises Forever IPTV on its website (depicted above) and on its Facebook page (depicted below), claiming that Forever provides access to over 5,000 live channels:

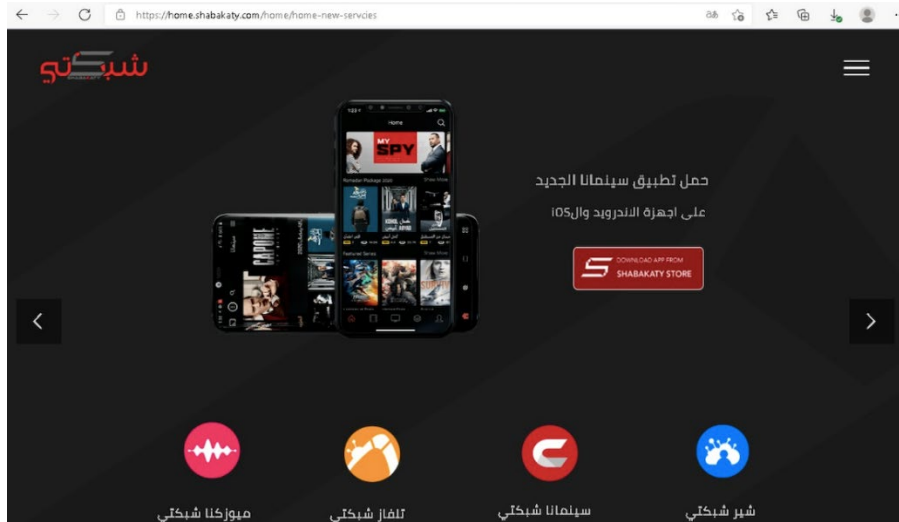
Mediastar Facebook pages with references to Forever IPTV and the M/S logo



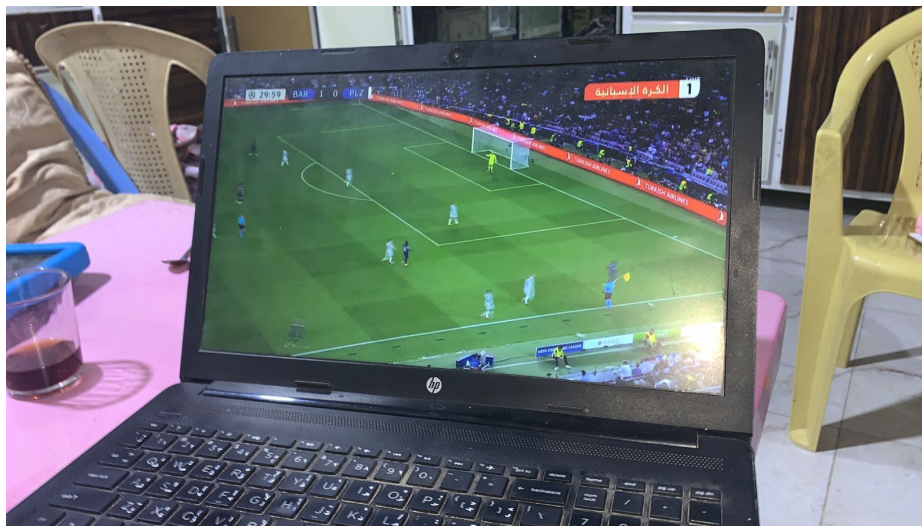
beIN and Miramax request that Chaloo remain on the Notorious Markets List for 2022.

Earthlink/Shabakaty (Iraq)

Earthlink is Iraq's largest internet service provider ("ISP"), and provides residential internet, data centers, ICT, and managed services to businesses and state and local governments across Iraq. In addition, Earthlink operates a local pirate IPTV service known as Shabakaty. Shabakaty is believed to have around 500,000 subscribers in Iraq, with 165,000 subscribers in Baghdad and 100,000 in Basra. Shabakaty currently provides access to selected matches broadcasted on beIN channels. Shabakaty also has an on-demand service that offers illegal access to Netflix content and other movies and series owned by major US and international right holders, including Miramax, Disney, Fox, HBO, Paramount Pictures, Sony Pictures, Universal Pictures, and Warner Bros. The Shabakaty service is available on a set-top box, a mobile app (OTT), and on a website. It can be accessed only from within Iraq. Subscriptions are priced at approximately USD 8 per month. It is estimated that this piracy generated the company around USD 50 million per year in revenue. Reports indicate that at least the web-based and the OTT Shabakaty content may be offered free of charge. A screenshot of a webpage offering to download the Shabakaty mobile app (for Android and iOS) is provided below:



We understand that Earthlink makes important matches available for free to anyone within Iraq who can access the service via web browser, effectively giving away exclusive beIN content as a promotion for their internet service.



Shabakaty also provides unauthorized access to Miramax content, including films such as Pulp Fiction and No Country for Old Men, among many others. A recent screenshot showing movies available on Shabakaty in 2022 is included below

The screenshot shows the website 'Cinemana movies' with the URL 'cinemana.Shabakaty.com'. It features a navigation bar with 'Always open' and 'Not yet rated (0 reviews)'. Below this is a 'Suggest Edits' button and a 'Photos' section displaying a grid of movie thumbnails including 'Darking', 'Nix', 'Hocus Pocus 2', 'Mardi Kombat! Legends: Snow Blend', 'Confess, Fletch', 'Gandhi', 'The Vanished', 'Whispering Comets: The Humming', and 'Archer'. The main content area is a video player for 'Bullet Train', which is a 2022 action comedy film. The player shows a rating of 7.5 and a duration of 2 hours and 2 minutes. The synopsis in Arabic reads: 'على متن قطار فائق السرعة، ينتقل 5 من القنلة المأجورين في رحلة لتنفيذ مهمة دون معرفة أحدهم بالآخر، وسرعان ما يكشف أن هناك عامل مشترك يجمعهم جميعاً بالمهمة المطلوبة إنجازها'. The player also includes a 'Show on YouTube' button and a warning: 'يحتوي على مشاهد غير لائقة، لذلك وجب التنبيه'.

Earthlink is owned by three Iraqi brothers – Sarmad Hassan Ahmed, Ahmed Hassan Ahmed, and Sadeer Hassan Ahmed. Earthlink is also registered in the UAE, where the Ahmed brothers appear to be based and run their operations. Earthlink boasts partnerships with several telecommunications regulatory bodies in Iraq.

beIN has sent cease and desist letters to Earthlink. Given the systematic deficiencies in law enforcement in Iraq, there appears to be little, if any, prospect for meaningful enforcement action. beIN and Miramax consider that pursuing these operators in a civil action would be fruitless.

Most recently, in 2021, USTR included Shabakaty on its Notorious Markets List, and acknowledged that Shabakaty was reportedly hosted by Earthlink Telecommunications, the largest Internet service provider in Iraq. Since then, the Shabakaty piracy has continued. beIN and Miramax request that Shabakaty remains on the Notorious Markets List for 2022.



أفلام سينمانا "Cinemana movies"

6 September at 17:53 ·

The start of the match between Chelsea and Ukrainian Dinmo Zagreb
Stream will only be game time
Live on my network TV, channel 10 M. O U T. I want to. A How many of you are on my mind

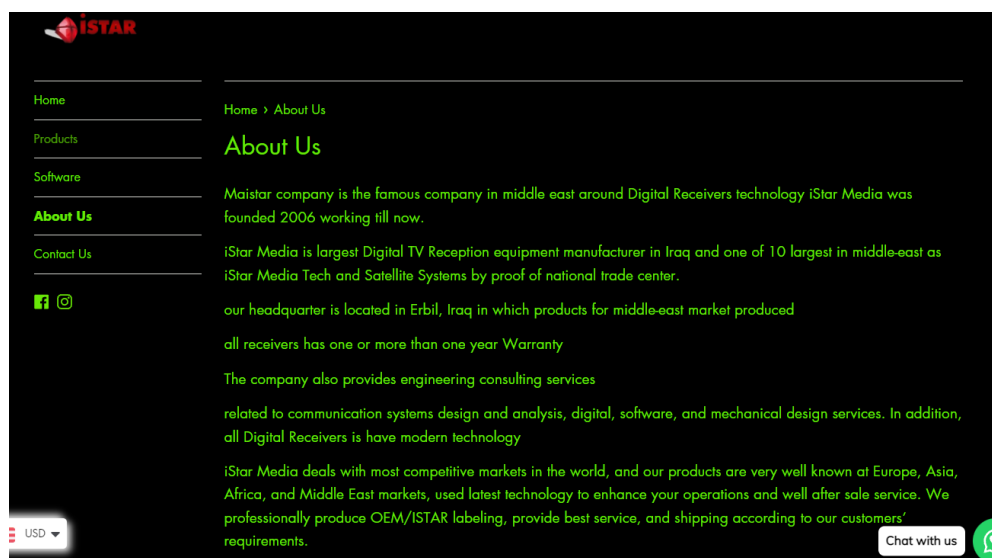
See original · Rate this translation



iStar

iStar Media (“iStar”) is a major Iraqi pirate also operating out of Erbil. In 2021, USTR added iStar to the Notorious Markets list, highlighting the availability of iStar receivers around the world, including the United States and Europe.

We understand that iStar distributes receivers enabled for satellite and IPTV piracy, and operates a localized piracy network. On its website: <https://istar-3d.com/pages/about-us> (screenshot immediately below), iStar claims to be the “largest Digital TV Reception equipment manufacturer in Iraq.”



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. iStar receivers also provide access to IPTV services such as Zeed Gold, which in turn provide access to VOD content.² Within the Online TV app, the beIN logo on beIN channels is often covered with an “Online TV” logo, as shown below.

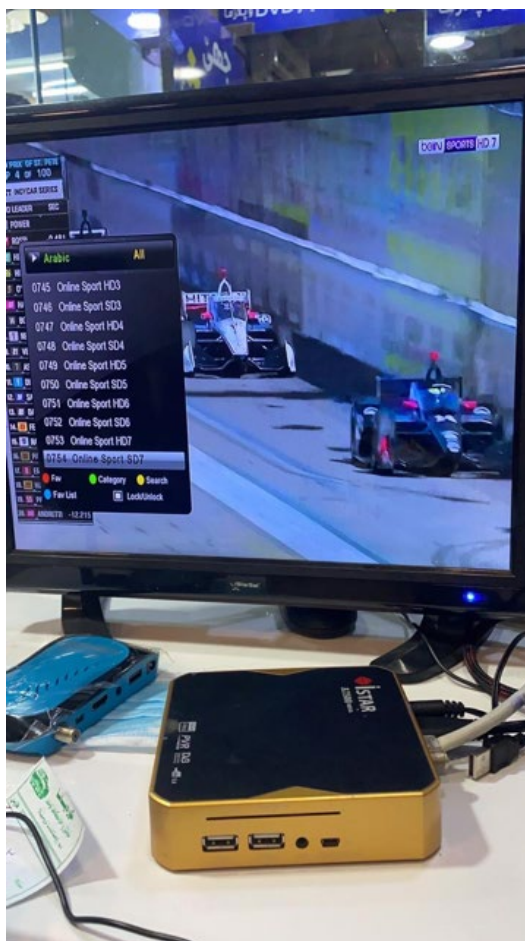


The screenshot below shows a pirated beIN broadcast of the 2020 NBA Finals between Miami Heat and the Los Angeles Lakers, made available through an i-Star-branded receiver:

² See <https://istaruscanada.com/shop>.



To take another example, i-Star receivers provided unauthorized access to beIN's broadcast of the Indycar Series, Harvest GP 2020, as shown below:



iStar-branded receivers are widely sold across Europe and the United States. Pirated streams of beIN channels with the “Online TV” logo have also been seen on many other pirate IPTV services and websites (similar to Mediastar).

iStar websites include www.iistar-korea.eu and www.istar-hd.com. iStar also has a US-focused reseller website, www.istarus.com, as well as a general reseller website, online-tv.codes.

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.³

beIN and Miramax request that iStar remains on the Notorious Markets List in 2022.

³ See <https://www.ibcap.org/ibcap-announces-24-million-lawsuit-against-istar-iptv-service/>; <https://storage.courtlistener.com/recap/gov.uscourts.mied.357115/gov.uscourts.mied.357115.1.0.pdf> .

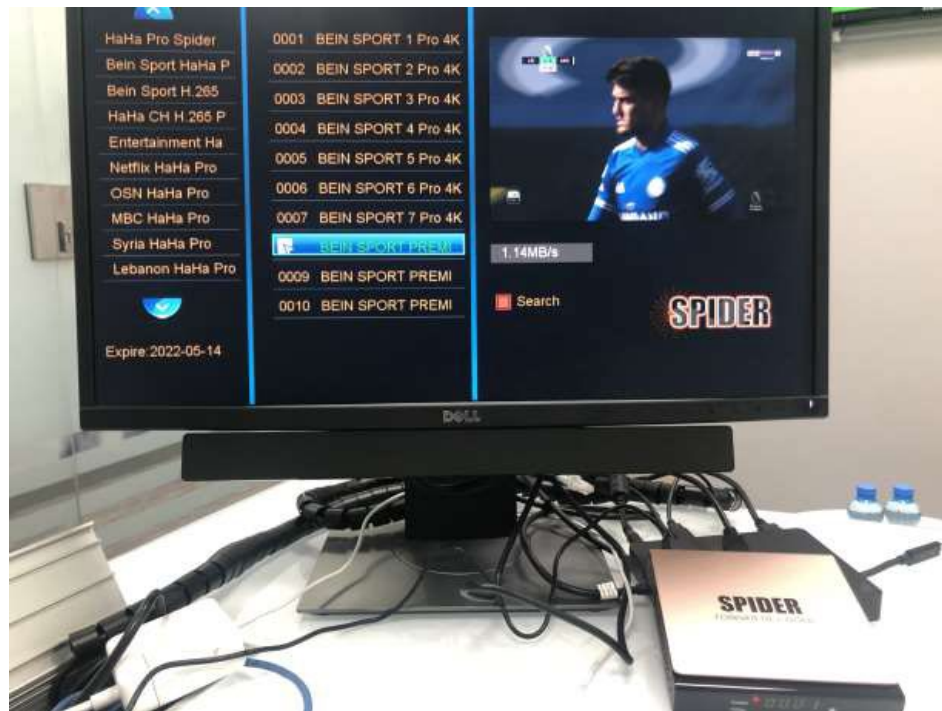
Spider

The Spider company, based in Amman, Jordan, distributes Spider-branded devices across the MENA region and Europe, either via online sales (including at <http://spiderreceiver.com>) or from physical shops. In 2021, USTR added Spider to the Notorious Markets List, highlighting reports that Spider's devices come pre-loaded with subscriptions to pirate IPTV apps.

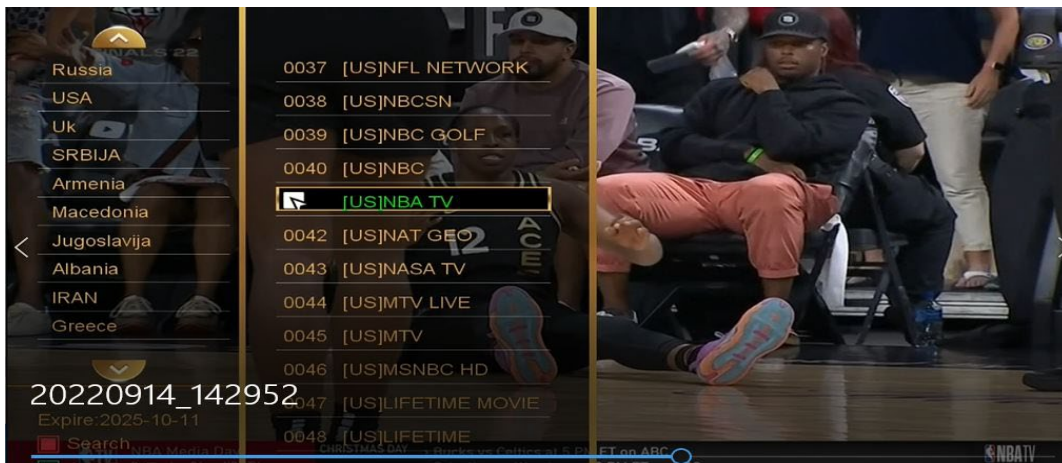
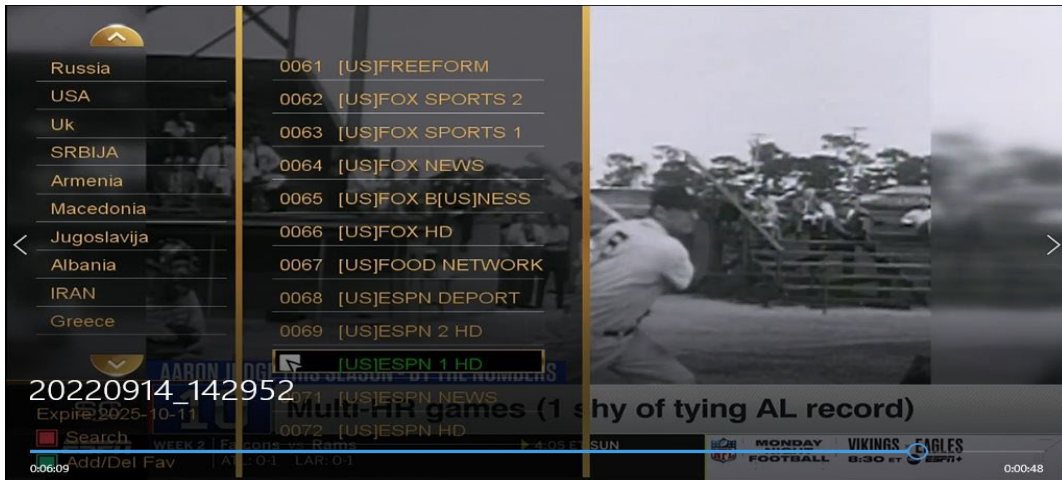
Specifically, Spider receivers are typically supplied so as to enable easy access to the following pirate IPTV apps:

- Golden IPTV
- MYHD IPTV
- Echoo IPTV

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. A screenshot of beIN channels available on a Spider device is included below:



Screenshots of some of the pirated US television channels made available on Spider devices in 2022 are included below:



Subscriptions to well-known pirate IPTV services Haha IPTV, Brave, and MYHD IPTV, are also openly sold from the Spider company's website at <http://spiderreceiver.com>, as can be seen below:



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.⁴ 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.

beIN and Miramax request that Spider remain on the Notorious Markets List for 2022.

Dream TV

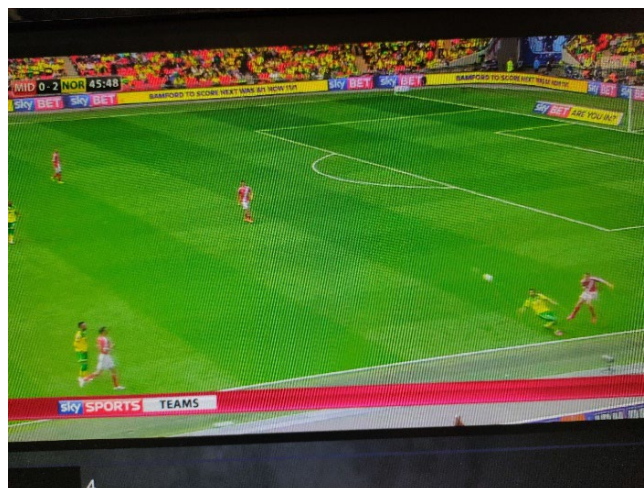
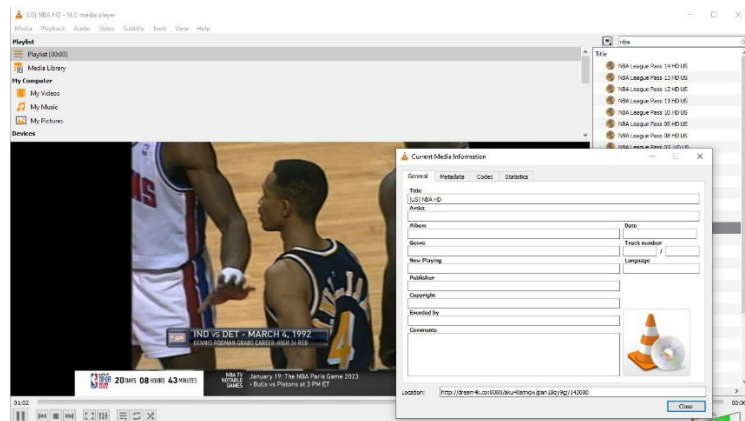
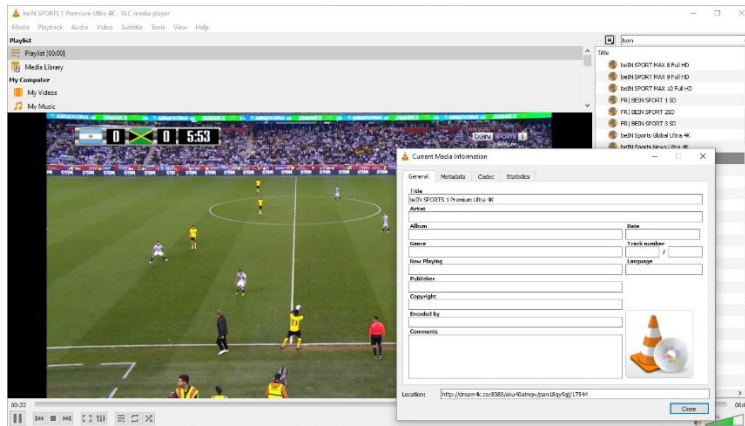
Dream TV is a well-known and widely viewed Moroccan-based pirate IPTV service provider.



On its website, <https://dreamtviptv.com/en>, Dream TV presents itself as the largest provider of IPTV international channels on the market for individuals and resellers, offering 2,300 channels of different qualities: SD, HD, FHD and H265.

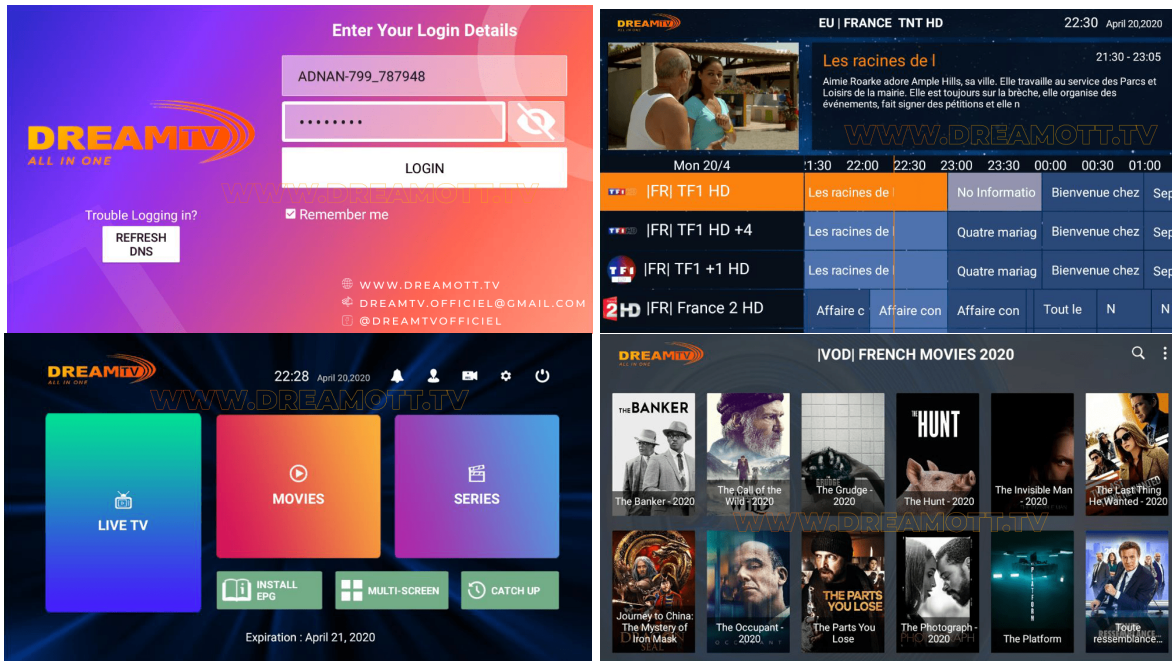
⁴ <https://about.dish.com/news-releases?item=123321>

Through its investigations, beIN has found that Dream TV is likely responsible for a substantial proportion of pirated beIN channels streamed in the pirate IPTV ecosystem. These are all pirate streams showing pirated beIN channels, as well as Miramax content and channels belonging to other international and US rights holders, such as: ABC News, Cartoon Network, CNN, FOX, and NBC. Screenshots of soccer and NBA games on beIN being shown on Dream TV are provided below, along with screenshots of Sky Sports:

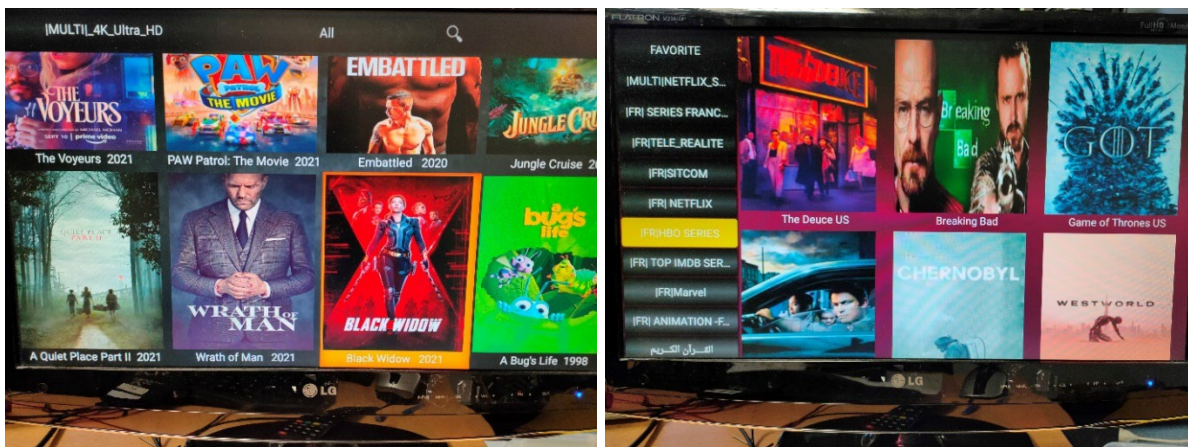


Dream TV offers for download several android apps which, in combination with a valid subscription, provide direct access to infringing content. These apps are available at: <https://dreamtviptv.com/fr/products/android-2>.

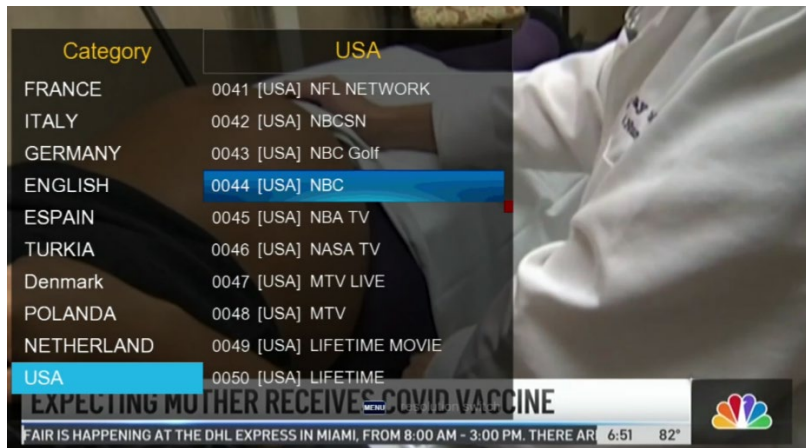
Screenshots of Dream TV’s user interface are included below:



Screenshots of some of the movies and TV shows available on Dream TV, including Miramax movies and other well-known US content, are shown below:



Screenshots of some of the television channels available on Dream TV, including CNN, CBS, Cinemax, Cartoon Network, FOX, NFL Network, NBC, NBA TV, MTV, and Lifetime are included below:



Dream TV's IPTV Reseller Program, which allows individuals to sign up, purchase and resell Dream TV, is also available on Dream TV's website at: <https://dreamtviptv.com/fr/revendeur-iptv>.

Since 2022, the Dream organization is known to be vertically integrated in a manner that covers all aspects of piracy: in addition to an IPTV service, a content source network (see image below),

and a reseller network, the Dream organization is also closely linked to Moroccan receiver brand Dreamsat (dreamsat.ma). Dreamsat sells IPTV receivers allowing to receive 8000 pirated channels.



HOME / RÉCEPTEUR

Dreamsat 310 Mini

- Résolution HD 1080p prise en charge
- Sortie vidéo/audio HDMI
- Lecteur de carte CA
- Port Ethernet LAN
- Recherche aveugle sensitive
- 8000 chaines de stockage
- 64 satellites de stockage
- Menu multilingue pris en charge
- DiSEqC 1.0, 1.1, 1.2
- USALS pris en charge
- Enregistrement et lecture via USB
- Timeshift pris en charge

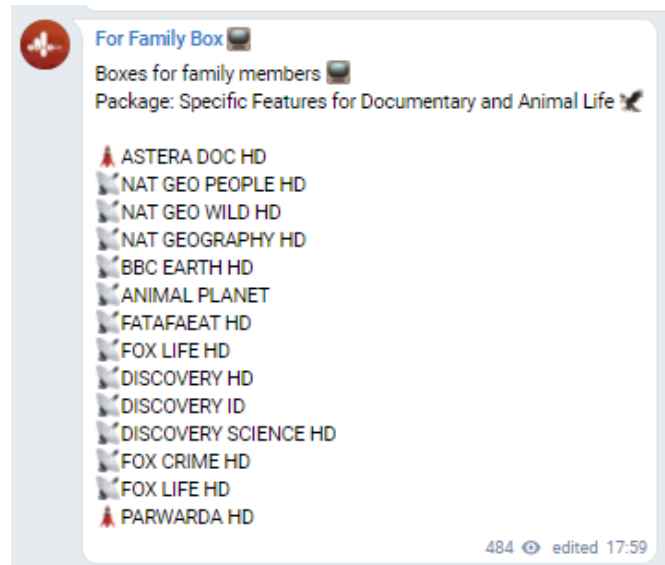
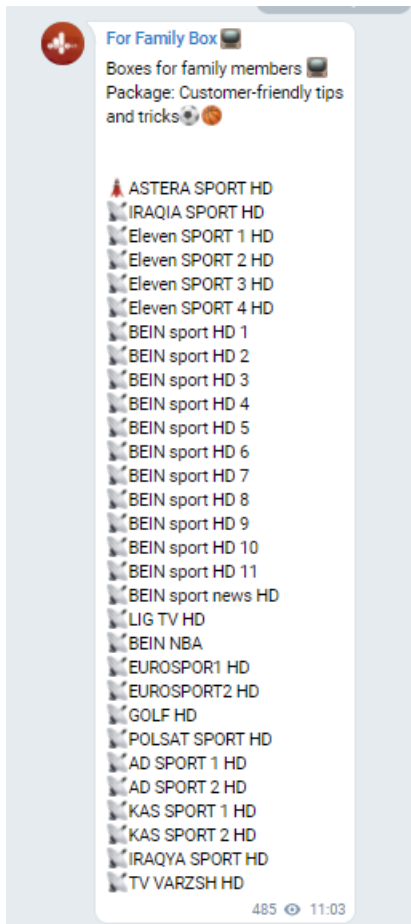
beIN and Miramax request that Dream TV and Dreamsat be added to the Notorious Markets List.

Family Box

Family Box is both a terrestrial pirate organization covering Kurdistan, and an IPTV pirate organization with global coverage. Its offices are in Erbil, Iraq. The terrestrial network broadcasts 270 channels, while the IPTV network broadcasts 7,000 channels. Video-on-demand content on the IPTV network includes approximately 20,000 movies. Family Box makes available beIN channels, as well as other international and US rights holders' content. A screenshot showing the promotion of FOX as being available on Family Box is provided below:



Family Box has promoted its services via a Telegram channel, in which it advertises the availability of several US and international channels, including National Geographic, Discovery, FOX, and BBC Earth, as well as content from Netflix.





September 10

For Family Box

FAMILY

"watch the world"

NO TIME TO DIE

007

THE WOLF AND THE LION

ROMANUJ NEXT LEVEL

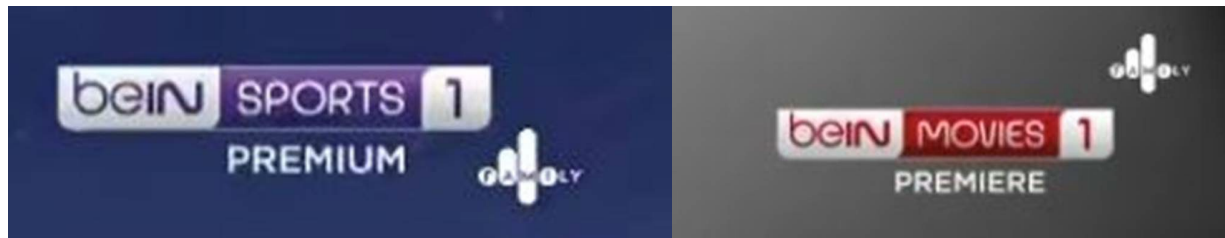
لەگەل فامېلى بۆكس
بېنەرى ھەموو قىلمە جېھانئەكان بېنە

For Family Box For Family Box For Family For Family Box

لەگەل فامېلى بۆكس
بېنەرى ھەموو قىلمە جېھانئەكان بېنە

قىمە ئايندىمىن
1.2K 20:09

Family Box uses a “Family” logo, which is seen on a very high proportion of pirated beIN channels on pirate IPTV services monitored by beIN throughout the region and internationally. This indicates that Family Box is likely the source of these pirated streams.



beIN and Miramax request that Family Box be added to the Notorious Markets List.

Icone / GoGo IPTV

Icone distributes Icone branded receivers, which are manufactured by South Korean-based Aloys.

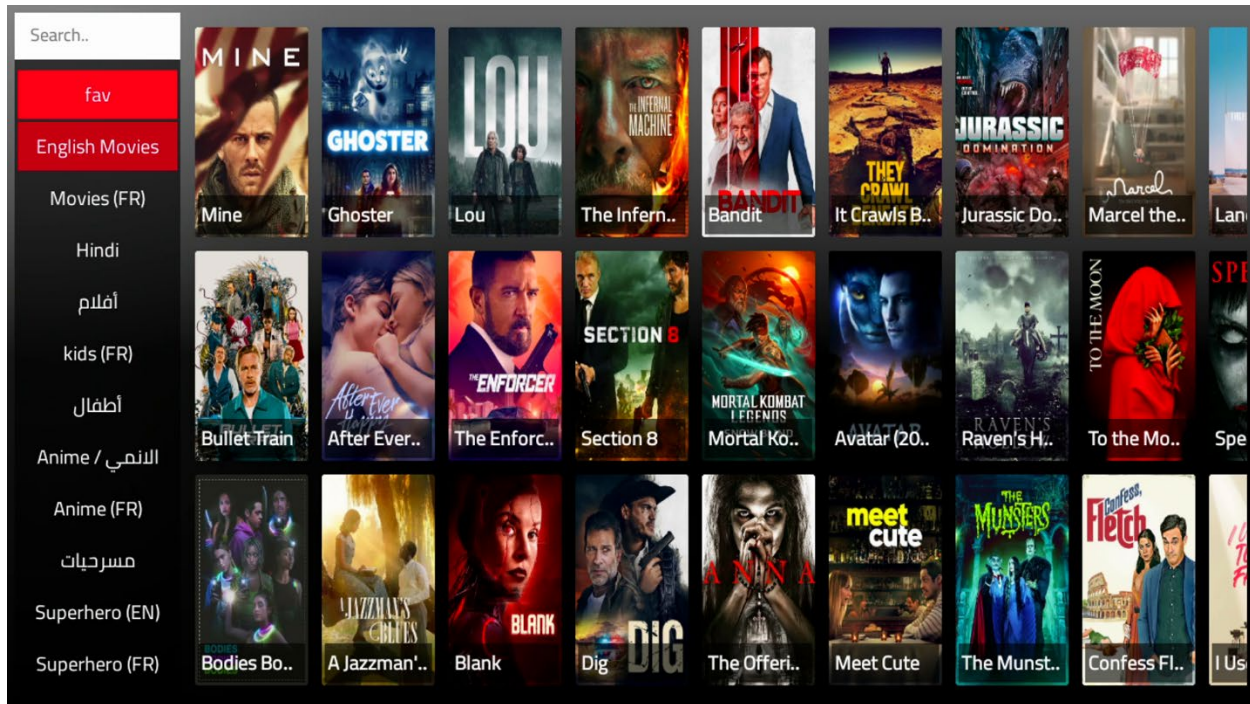
Icone is headquartered in the UAE, from which it exports and distributes receivers across MENA and Europe. It advertises offices in Morocco, Algeria, Tunisia, and Canada (see <http://www.icone-tech.com/>).

Icone receivers provide access to pirate IPTV content by means of the **GoGo IPTV** app, which is preconfigured for easy download on the device. Authentication of the app is included in the purchase of the device. Instructions on how to activate the GoGo IPTV subscription on Icone devices are also included on the GoGo IPTV website (see: <https://gogoiptv.net/activation-gogoiptv/>).

The GoGo IPTV app makes available thousands of pirated television channels and on demand content, including beIN channels, Miramax content and content of other US and international rights holders. For example, GoGo IPTV provides access to US channels such as: Cartoon Network, CNN, Discovery, FOX, HBO, National Geographic, and NBA HD. A screenshot of a beIN channel being made available on GoGo IPTV is provided below:



Screenshots of on demand movie content available on GoGo IPTV are included below:



GoGo IPTV also operates a reseller program, by which others can sell access to GoGo IPTV (see <https://gogoiptv.net/>).

beIN and Miramax request that Icone and GoGo IPTV be added to the Notorious Markets List.

Redline / Red IPTV

Redline is a Turkish company (DTS Elektronik Sanayi Ticaret Limited), with offices in Istanbul, Turkey, and Shenzhen, China (see: <https://redline.com.tr/en/about-us>).

Redline distributes receivers into markets across MENA, Europe, and North America.

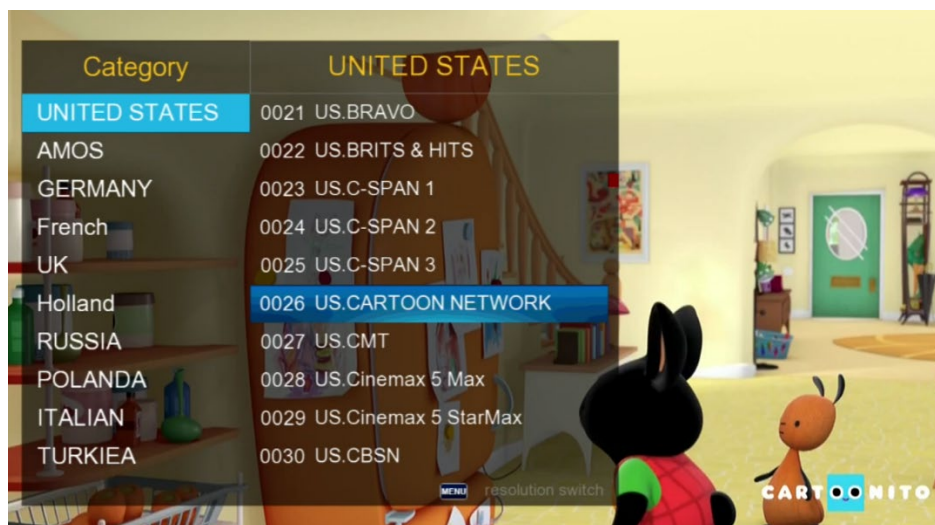
Redline is associated with IPTV apps, which distribute pirated IPTV channels, including RedIPTV app, and an OTT interface (which provides additional functionality and playlists for use with Smart TVs and other devices). Other brands and websites associated with Redline include Red360, 7line.tv, and Redlineteknik.com. See: <http://redlineiptv.com/> and <https://www.rediptvapk.com/>.

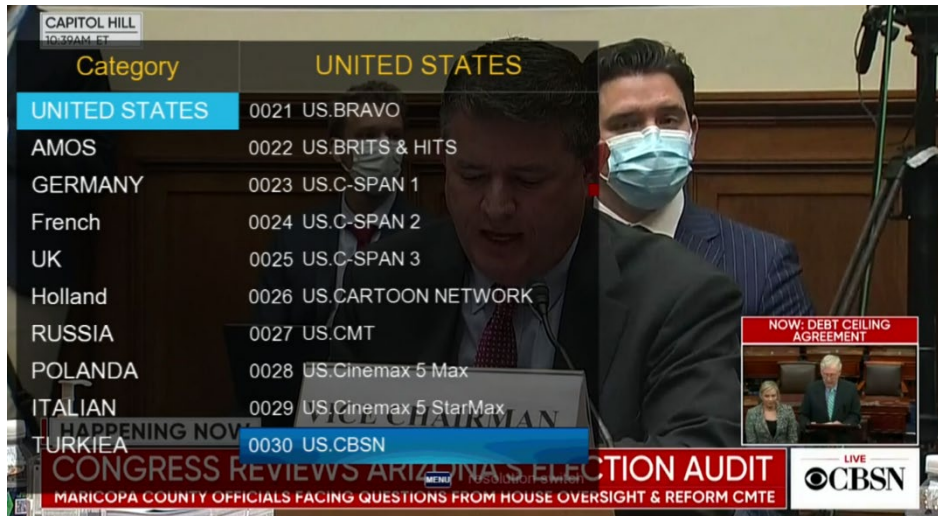
“Golden IPTV” is the main pirate IPTV app pre-installed on this device (as well as on Spider branded devices). Golden IPTV provides access to pirated beIN channels and Miramax content, as well as other international and US rights holders’ channels, such as: Cartoon Network, CBS, Discovery, Disney, ESPN, FOX, HBO, MTV, National Geographic, NBA HD and NBC.

In addition, the devices have been supplied with other well-known piracy apps widely seen in the MENA region, including:

- Haha IPTV
- MYHD IPTV
- Echoo IPTV

All of these apps make available pirated beIN channels, as well as content from Miramax, and many other US and international channels, including Cartoon Network, CNN, Discovery, FOX, MTV and NBC. Screenshots of Cartoon Network and CBS channels being made available on MYHD IPTV are provided below:





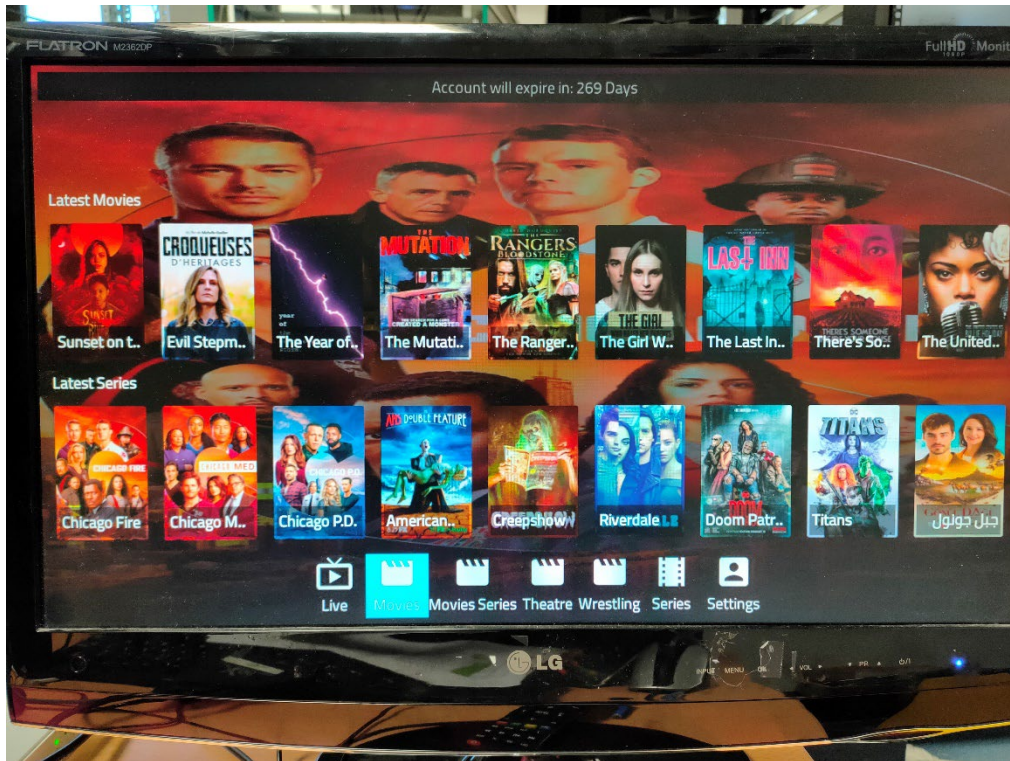
beIN and Miramax request that Redline and Red IPTV be added to the Notorious Markets List.

Renbow TV / Cobra IPTV

Renbow TV (“Renbow”) and Cobra IPTV (including Cobra Plus IPTV and Cobra Ultra+) are pirate IPTV applications that work on any android device. They are popular across the MENA region, and widely distributed online. They come pre-installed on many android receivers (such as the X96 mini).

An activation code, which can be obtained from resellers in the MENA region, is required to access the pirate app. After successful authentication, users are able to access numerous pirated channels, such as beIN’s channels, Miramax content, as well as other US and international rights holders’ channels, such as: ABC News, Cartoon Network, CBS, CNN, Discovery, Disney, ESPN, FOX, HBO, MTV, National Geographic, NBA HD and NBC.

Below is an image of pirated movie content available on Renbow TV, revealing significant US content:



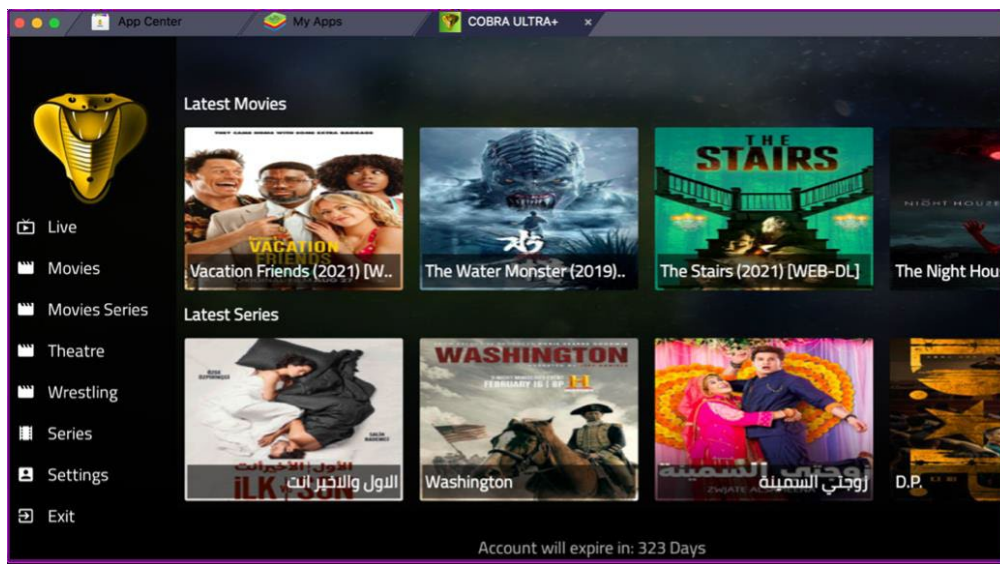
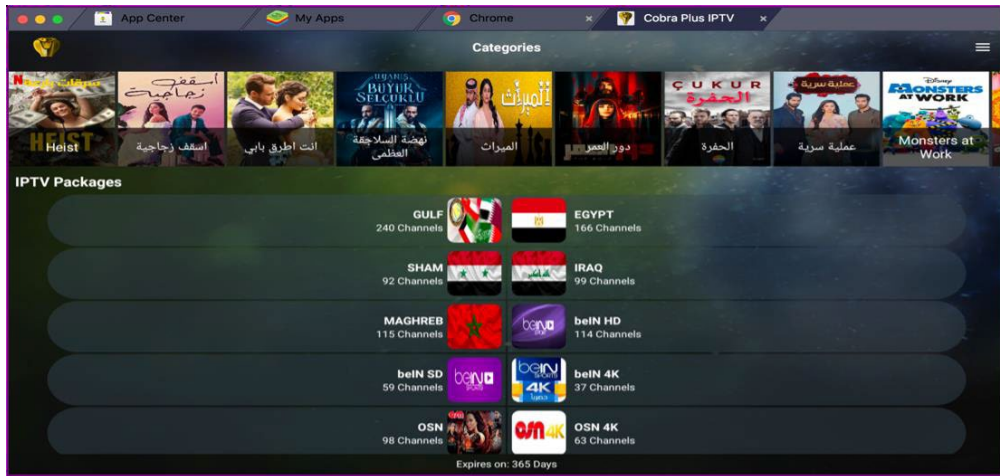
Below are examples of pirated US television content available on Renbow TV, including content from NBC, NFL Network, NHL Network, Nickelodeon, and Paramount:



Examples of pirated beIN and Miramax content available on Cobra Plus IPTV and Cobra Ultra+ are provided below:



Cobra Plus IPTV offers a total of 50 different categories of content and 9,763 channels. Cobra Ultra+ offers 50 categories and 6,182 channels, including beIN Sports channels. The user interfaces of Cobra Plus IPTV and Cobra Ultra+ are shown below, as is a screenshot of the Cobra Ultra+ Electronic Program Guide showing the availability of premium beIN Sports channels:

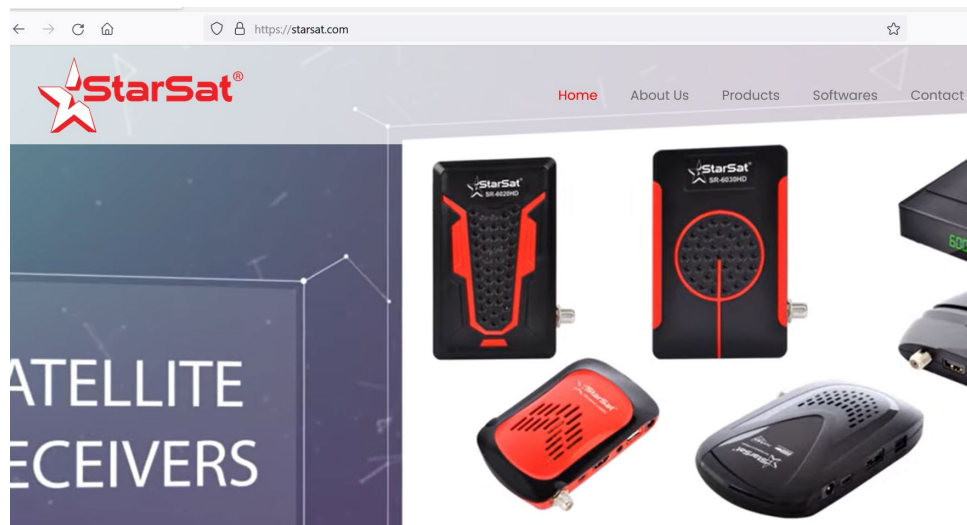


beIN investigations have shown that these apps are being operated by the same individual, who is located in Bahrain.

beIN and Miramax request that Renbow TV and Cobra IPTV be added to the Notorious Markets List.

Starsat / Geant / Apollo IPTV

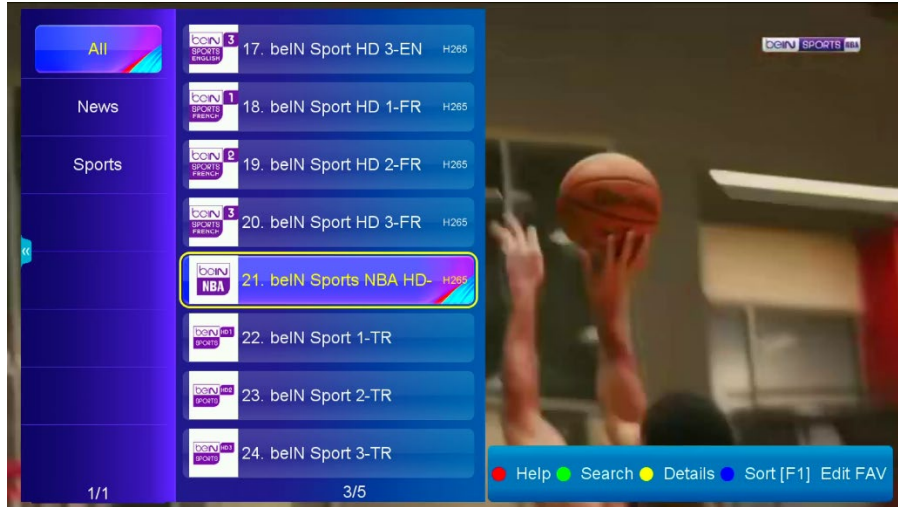
The Starsat company (Star Sat Trading LLC) is headquartered in the UAE from which it exports and distributes “Starsat” and “Geant” branded receivers, across the MENA region. Starsat receivers are advertised on Starsat’s website: <https://starsat.com>.



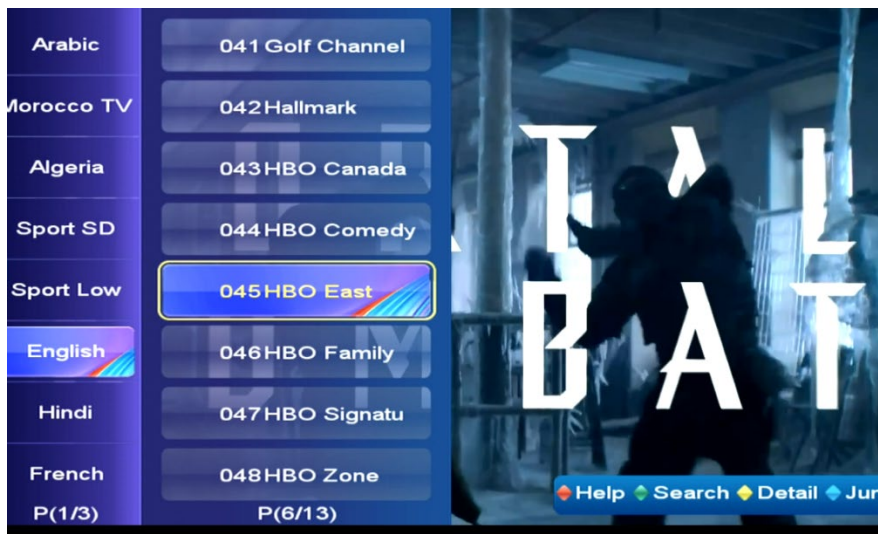
The receivers are manufactured in China, by Zhuhai Gotech Intelligent Technology Co., Ltd (GoTech). Through its investigations, beIN has been able to gather significant evidence establishing the relationship between Starsat and GoTech.

The receivers manufactured by Starsat are configured to access pirated IPTV content by means of the “Apollo 5” IPTV app. beIN investigations show that the GoTech company is linked to the infrastructure behind the Apollo IPTV app.

Apollo IPTV provides access to beIN and Miramax channels, as well as other US and international rights holders’ channels. For example, the following US channels are available on Apollo IPTV: CBS, Disney, HBO, MTV and National Geographic. A screenshot of a beIN channel being made available on the Apollo IPTV service is provided below:



Screenshots of other pirated television content (CBS Sports and HBO) available on Starsat receivers using the Apollo IPTV app are included below:



beIN and Miramax request that Starsat, Geant, and Apollo IPTV be added to the Notorious Markets List.

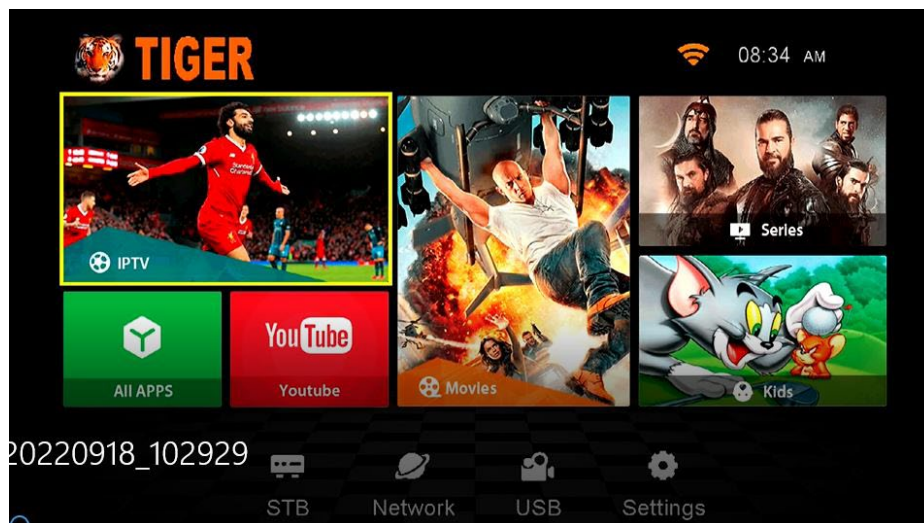
Tiger

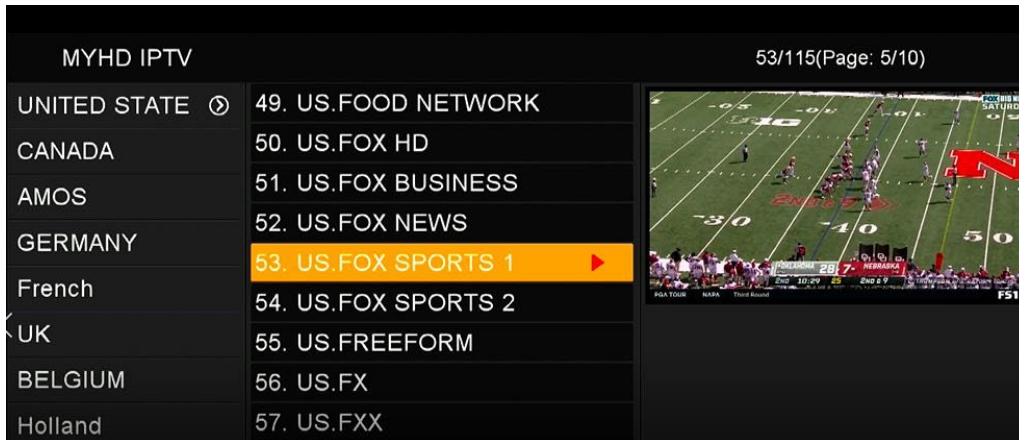
Tiger International Company is a wholesale consumer electronics company established in Amman, Jordan. Tiger’s business has been primarily focused on the sale of receivers which offer pirated streaming and video-on demand content from many US rights holders. Tiger branded devices are primarily sold across the MENA region, but are available around the world. Tiger uses independent agents and distributors, as well as direct selling platforms, to sell its devices.



Well known IPTV services that come pre-installed on the devices include **Red IPTV, Royal IPTV, Haha IPTV, Echoo IPTV, Golden IPTV, MYHD IPTV, and Apollo IPTV.**

As described above, these apps make available 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: ABC News, Cartoon Network, CBS, CNN, Discovery, Disney, ESPN, FOX, HBO, MTV, National Geographic, NBA HD, and NBC.





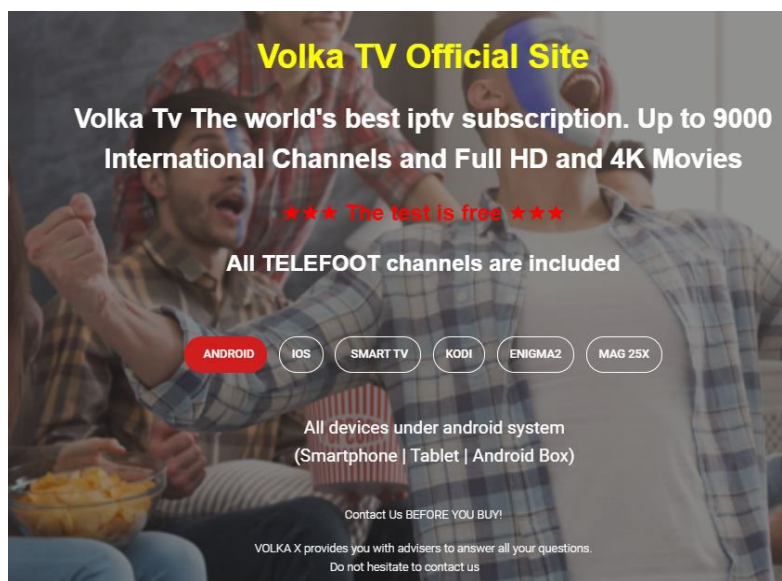
beIN and Miramax request that Tiger be added to the Notorious Markets List.

Fosto IPTV

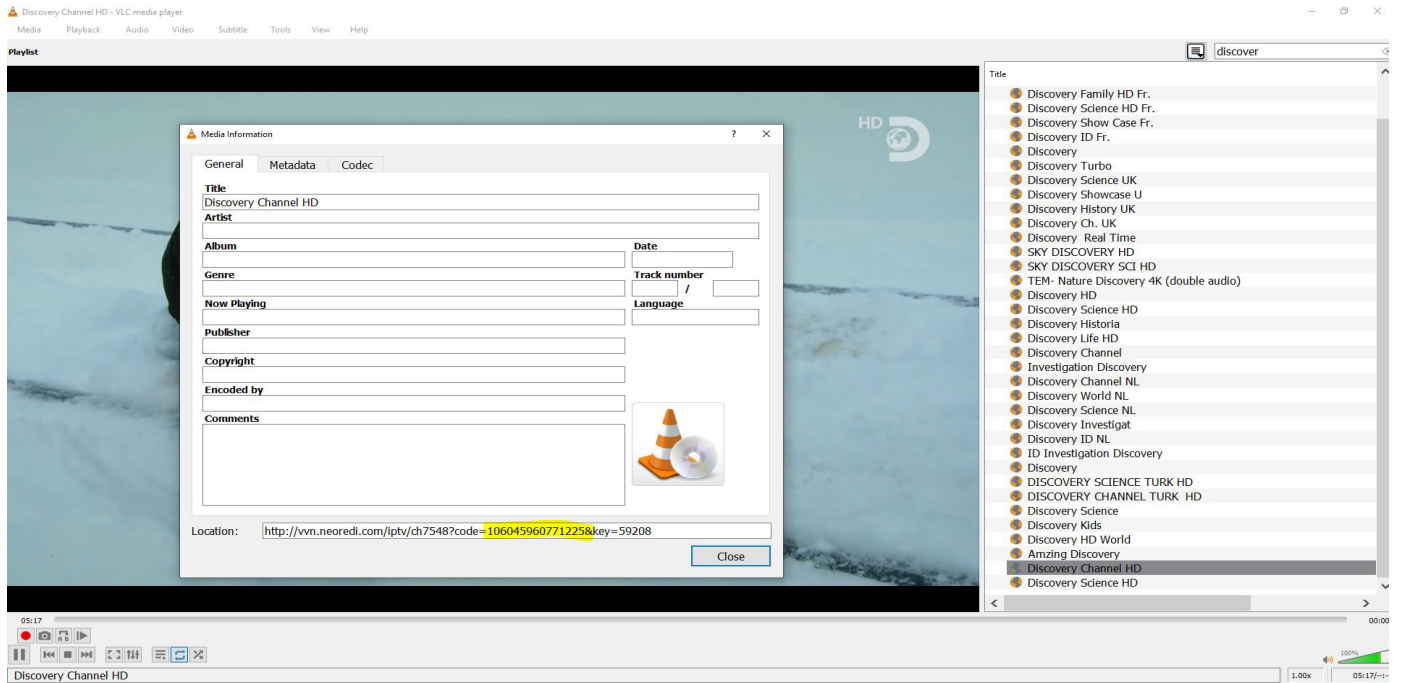
Fosto IPTV, which was previously known as Volka IPTV prior to a name change earlier this year, was established in 2015 by a Tunisian national.

The service uses an effective reseller scheme, which has led to the creation of many offshoot websites featuring the Fosto/Volka branding. Resellers are mostly located in Tunisia, Morocco and Algeria.

Fosto IPTV makes available beIN channels and Miramax content, as well as many other channels belonging to international and US rights holders, including ABC, Showtime, FOX, CBS, HBO, NBC, NBA HD, Fox Sport, and ESPN. In the screenshot below, Fosto promoted Volka as offering up to 9000 international channels.



Examples of some of the US content available on Fosto IPTV is shown below, including a screenshot of an MLB game on ESPN, and a list of the many Discovery channels readily available.



Examples of some of the many on-demand movies available on Fosto IPTV are pictured below:



NEW FILMS



When announcing its name change to its customers on volkatv.online, Fosto IPTV indicated that its “new application” will provide “better delivery and more prestigious services in order to always offer you the best in choice and quality.” The pirate clarified that “nothing changes for our old subscribers and we welcome new FOSTO TV customers.”

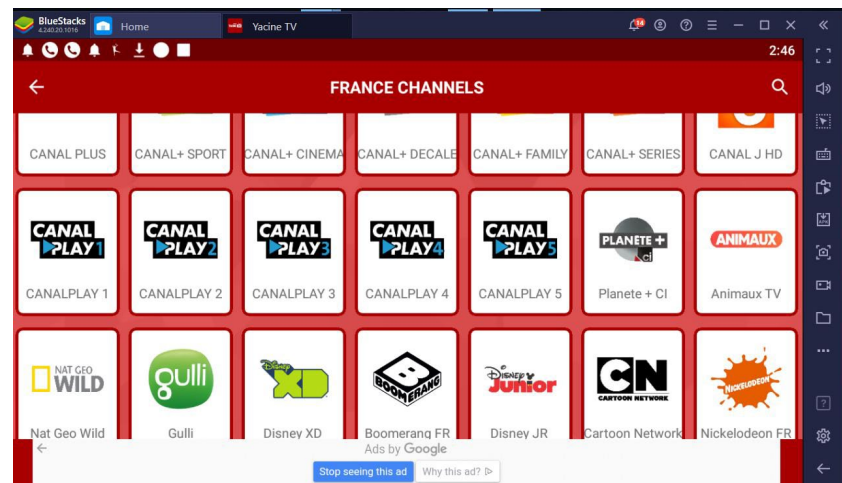
beIN and Miramax request that Fosto IPTV be added to the Notorious Markets List.

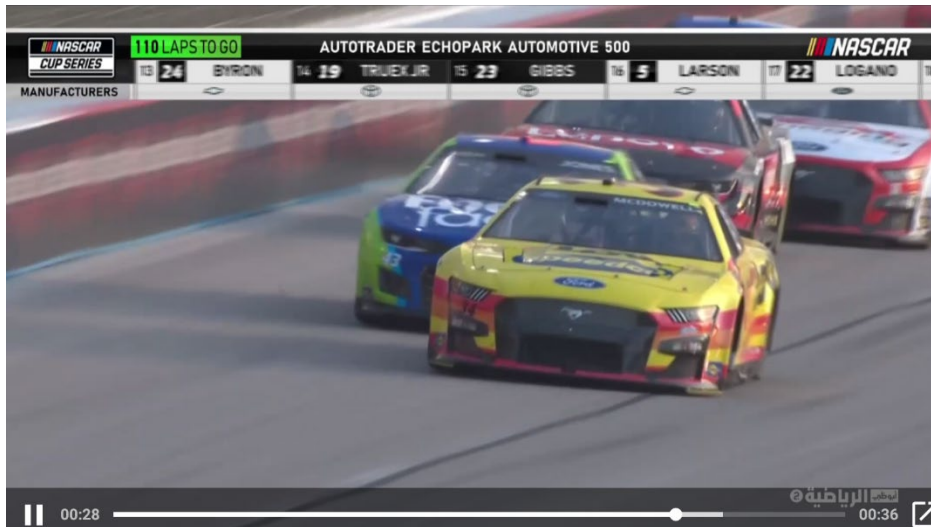
Yacine TV

Yacine TV is a popular piracy app which is likely operated from Algeria. The “Yacine TV” brand appears to be very popular in North Africa. When searching the Internet for Yacine TV, many results appear, including for copycats of this piracy service. Investigations indicate that the “official” version of this app is available at: <https://yacineapp.tv>. A screenshot of the Yacine TV logo is provided below:



Yacine TV makes available beIN channels, as well as many other international channels. Screenshots showing beIN and US content available on Yacine TV are provided below:





beIN and Miramax request that Yacine TV be added to the Notorious Markets List.

Conclusion and Recommendations

beIN and Miramax respectfully submit that the above-listed IPTV pirates should be included in USTR's 2022 Notorious Markets List because of their highly detrimental impact on legitimate broadcasters and rights owners, including US content creators and sports leagues. Among those pirates, beIN and Miramax request that Chaloos, iStar, Shabakaty, and Spider, which were previously included in USTR's 2021 Notorious Markets List, remain on USTR's 2022 Notorious Markets List, given that the piracy from these entities continues. Further, beIN and Miramax request that Dream TV, Family Box, Icone /GoGo IPTV, Redline/Red IPTV, Renbow TV / Cobra IPTV, Starsat/Geant/Apollo IPTV, Tiger, Fosto IPTV, and Yacine TV be added this year.

Should USTR have any questions or require any further information, beIN and Miramax remain at your disposal.