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Office of the United States Trade Representative  
600 17th St., NW  
Washington, DC 20508

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**Submission by Liga Nacional de Fútbol Profesional for the Request for Comments regarding the 2025 Special 301 Review**

**(Docket No. USTR-2024-0023)**

Dear Mr Lee

**Introduction**

Liga Nacional de Fútbol Profesional (“**LALIGA**”) is a private sports association composed of the 20 public limited sports companies (SADs) and clubs of LALIGA first division and the 22 of LALIGA second division and is responsible for organizing professional football competitions in Spain.

The aim of LALIGA is, among other things, to commercialize its audiovisual rights corresponding to the transmissions of its competition. For this purpose, LALIGA makes significant economic efforts to ensure that the fans can enjoy high-quality TV broadcasting through the invest in new technologies (i.e. 4K-HDR recordings or 360° replays, among others). As a result of the commercialization of those rights, LALIGA generates thousands of job positions and important tax revenues that boost the economy of many countries. Just considering these facts, the audiovisual rights of the sports competitions necessarily require special protection since their infringements directly affects a very important source of work and economic resources of many countries.

LALIGA began its fight against audiovisual fraud in 2013, observing an exponential increase in such activities driven by the ease of access to illegal content through dedicated servers providers, search engines, streaming websites, VPN and illegal IPTV services. It is estimated that clubs lose approximately €600-700 million annually—an amount equivalent to nearly half of the audiovisual rights revenue distributed during the 2022-23 season in LALIGA EA SPORTS. Audiovisual rights represent the largest source of income for 80% of professional clubs.

LALIGA has been significantly impacted by live sports broadcast piracy, including the unauthorized live streaming of sports events over the Internet. Internet piracy of live sports broadcasts is a growing issue facilitated through Dedicated Server Provider, Streaming websites, illegal IPTV services and e-commerce platforms (collectively, “Infringing Service(s)”).

A Dedicated Server Provider (DSP) is a company that offers infrastructure and hosting services, providing clients with full access to physical servers exclusively reserved for their use. These servers offer greater control, reliability, and performance compared to shared hosting. Clients can configure and operate the server based on their specific needs, including running websites, applications, or storing data. DSPs are often exploited for piracy due to their features such as high bandwidth, scalability, and storage capacity, which make them ideal for hosting illegal streaming websites, video streaming platforms, and unauthorized IPTV services that distribute pirated sports broadcasts and other illicit content. Operating as “bulletproof” hosting providers in jurisdictions with weak copyright enforcement, they deliberately offer anonymity and resistance to takedown requests, making it challenging to trace or shut down their operators. These servers enable large-scale piracy and are sometimes used to distribute malware or adware, further amplifying their misuse in illegal activities.

Streaming websites provide consumers with free access to live streams of matches and other live events. According to the LALIGA’s comprehensive consumer research, these websites continue to be the preferred method for pirate consumption in numerous markets globally. Streaming websites typically post infringing links



to sports events 15 minutes before they are set to begin.

Illicit IPTV services grant unauthorized access to hundreds, sometimes thousands, of TV channels by illegally sourcing content from legitimate service providers worldwide. These operators take advantage of intellectual property rights to deliver a much larger variety of content than any legitimate broadcaster, all without investing in production, rights acquisition or contributing to economic and community development.

E-commerce platforms, while pivotal to the globalized economy by enabling users to buy and sell a vast range of items, have also become a hub for distributing subscriptions to illegal IPTV services, which offer unauthorized access to LALIGA's content as well as setup boxes ready to enable piracy. Some major e-commerce companies are hesitant to engage in the fight against digital piracy, causing significant harm to the industry by failing to take action against the sale of illegal IPTV subscriptions, CCcam Lines (Conditional Access Control by Content Coding Module) illicitly used to decrypt encrypted satellite TV signals, granting unauthorized access to pay-TV channels without requiring a physical subscription card and Pirate Decoders, devices which enable the decoding of both satellite and internet signals preloaded or ready to install illegal IPTV services, further simplifying unauthorized access for users.

While it is not the primary focus of this submission, it is important to highlight the significant role that certain intermediary based in the United States, such as Google, Cloudflare, CoreDeluxe and X (formerly Twitter), have played as essential facilitators in the continued rise of piracy throughout 2024. These platforms and service providers offer critical infrastructure or services that enable piracy networks to thrive, including Anonymization, Content Delivery Network (CDN), Domain Name System, VPN, hosting, content indexing and social media promotion.

LALIGA appreciates USTR's recognition of online piracy and broadcast in its Special 301 Reports. As the problem persists, we encourage USTR to take this matter into account when preparing the 2025 Special 301 Report. LALIGA remains committed to collaborating with USTR to tackle the ongoing challenge of internet piracy of sports broadcasts.

Yours sincerely,

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Audiovisual Director

Liga Nacional de Fútbol Profesional



## Appendix A

### Recommendations for the Priority Foreign Countries

This submission intentionally emphasizes the Infringing Services operating in different countries involved in piracy: dedicated server providers, which supply the technical infrastructure essential for supporting illegal streams; piracy brands that monetize their operations through advertisements on streaming websites and paid subscriptions via illegal IPTV services; and e-commerce platforms that facilitate the infrastructure for commercial transactions. All internet visit statistics referenced in the submission represent global data obtained through Semrush's<sup>1</sup> traffic analysis tool.

#### **China**

During 2024, Infringing Services operating either in whole or in part in China, including MagisTV, FlujoTV and Amarutu Technology, provided services contributing to the piracy of a material number of LALIGA's protected content.

Recommendation: Priority Watch List

#### **Argentina**

During 2024, Infringing Services and piracy brands operating either in whole or in part in Argentina, including Futbol Libre, Deporte libre and Pelota Libre, achieved over 1.2 billion visits, with an average of 41 illegal streams per matchday.

Recommendation: Watch List

#### **Peru**

During 2024, Infringing Services and piracy brand Rojadirectaen vivo and PirloTV, operating either in whole or in part in Peru recorded an impressive total of 1.4 billion global visits.

Recommendation: Priority Watch List

#### **Macao**

During 2024, Infringing Service Netsolutions operating in whole in Macao, has repeatedly ignored takedown requests from LALIGA regarding infringing content hosted on their servers. Despite being notified of the violations, the provider continues to host material that infringes LALIGA's intellectual property rights, contributing to the ongoing challenge of combating piracy. During 2024/25 LALIGA season, over 151 infringing streams were administrated by this infringing service.

Recommendation: Watch List

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<sup>1</sup> <https://www.semrush.com/>



### **Hong Kong**

During 2024, Infringing Service HHXYTC-AS-AP based in Hong Kong has repeatedly ignored LALIGA's takedown notices. Their noncompliance facilitates the unauthorized distribution of copyrighted content, further exacerbating the global issue of IP infringement. During 2024/25 LALIGA season, over 147 infringing streams were administrated by this infringing service.

Recommendation: Priority Watch List

### **Russia:**

During 2024, Infringing Service Livetv.sx operating either in whole or in part in Russia, received over 217 million global visits in 2024. Despite blocking injunctions obtained by LALIGA in several jurisdictions, the site remains accessible and popular elsewhere.

Recommendation: Priority Watch List

### **Romania**

During 2024, Infringing Services operating either in whole or in part in Romania, including ZETSERVERS and NEXONHOST provided services contributing to the piracy of a material number of LALIGA's matches.

Recommendation: Priority Watch List

### **Singapore**

During 2024, Infringing Services operating either in whole or in part in Singapore, including reputable e-commerce platforms like Alibaba and Aliexpress provided services contributing to the sale of illegal IPTV subscriptions and devices.

Recommendation: Watch List

### **United Kingdom**

During 2024, Infringing Services operating either in whole or in part in United Kingdom, including HBing, BestDC and CCCamFrei.com provided services contributing to the piracy of 223 infringing streams per matchday.

Recommendation: Priority Watch List

### **Germany**

During 2024, Infringing Services operating either in whole or in part in Germany, including ecosystem of streaming sites Sporthd/Livesoccer, Tv247365.info and the network of piracy platforms Thedaddy.to/hesgoal/totalsportek/footybite registered more than 302 infringing streams per matchday.

Recommendation: Priority Watch List



### **Estonia**

During 2024, Infringing Service Estoxy operating in whole in Estonia, provided services contributing to 75 infringing streams of LALIGA's match days.

Recommendation: Priority Watch List

### **Ukraine**

During 2024, Infringing Services operating either in whole or in part in Ukraine, including Yurteh and Virtual Systems LLC provided bulletproof hosting services contributing to the piracy of 131 pirate streams of LALIGA's content.

Recommendation: Priority Watch List