1600 I Street, NW Washington, D.C. 20006 October 1, 2025

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

Re: Request for Public Comment on the 2025 Special 301 Out-of-Cycle Review of Notorious Markets — Docket No. USTR-2025-0018

Dear Mr. Lee:

The Motion Picture Association (MPA) submits the following response to the request issued on August 18, 2025, by the Office of the U.S. Trade Representative (USTR) inviting submissions from the public on notorious markets outside of the United States.

Introduction

MPA serves as the global voice and advocate of the motion picture, television, and streaming industries. We work in every corner of the globe to advance the creative industry, protect its members' content across all screens, defend the creative and artistic freedoms of storytellers, and support innovative distribution models that bring an expansion of viewing choices to audiences around the world. MPA's members are: Amazon Studios LLC; Netflix Studios, LLC; Paramount Pictures Corporation; Sony Pictures Entertainment Inc.; Universal City Studios LLC; Walt Disney Studios Motion Pictures; and Warner Bros. Entertainment Inc.

MPA Fights Global Piracy with Trusted Partners

MPA leads the Alliance for Creativity and Entertainment (ACE),¹ the world's leading coalition dedicated to protecting the dynamic legal market and reducing digital piracy. Driven by a comprehensive approach to addressing piracy through criminal referrals, civil litigation, and cease-and-desist operations, ACE has achieved many successful global enforcement actions against illegal streaming services and other sources of unauthorized content and their operators. Drawing upon the collective expertise and resources of more than 50 media and entertainment companies around the world and reinforced by the content protection operations of the MPA, ACE protects the creativity and innovation that drive the global growth of core copyright and entertainment industries.

We applaud USTR for welcoming comments this year regarding the copyright piracy of sports broadcasts. Recent information indicates that such piracy costs billions of dollars annually in lost

¹ For more information, please visit www.alliance4creativity.com.

revenues² and it deeply impacts several MPA members. The commercial value of sports lies almost entirely in real-time viewing. Unauthorized streaming of live events not only disregards exclusive broadcasting rights, but it directly threatens the economic framework that sustains professional sports leagues and global competitions. We are pleased that ACE has recently intensified its efforts to address piracy of live sports broadcasts.³

Encouraging Developments in the Ongoing Fight Against Global Piracy

We retain our focus this year on providing USTR our recommendations on the online marketplaces in which copyright infringement occurs. To be clear, physical notorious markets—and in some cases content distributors with physical distribution infrastructure—remain a persistent threat in many territories around the world. Online marketplaces that traffic in stolen content, however, are frequently extraterritorial in reach and have the most significant impact on the global legitimate market for U.S. movies and television programming and are a direct threat to our members' online businesses. Moreover, they are the focus of MPA and ACE's global content protection efforts. We laud positive developments in our tireless fight against digital piracy that have occurred since our previous submission to USTR, including:

- The takedown of domains associated with chronic notorious Internet protocol television (IPTV) offender MagisTV, that in part rebranded as Flujo TV. These domains received over 10 million annual visits. We remain committed to vigorously fighting the ongoing piracy of our content by this notorious offender.
- The shuttering of Streameast, which has been identified as "the world's largest illegal sports streaming platform." The service received over 1.4 billion annual visits across over 170 domains. ACE identified two operators in Egypt and assisted Egyptian law enforcement in acting against the operators.⁴
- The shutdown of the illegal South Korean piracy site TVWiki (formerly known as NoonooTV)—identified by MPA to USTR last year—the most popular illegal streaming site in Korea, as well as the arrest and sentencing of an operator who was sentenced to three years in prison and ordered to forfeit 700 million KRW (approximately \$510,000 USD) for violating the Korean Copyright Act.⁵
- A commitment from the operator of Türkiye's top two most popular infringing streaming services, Diziwatch and Filmmax—recommended by MPA for inclusion on last year's

² See, e.g., Misha Solodovnikov, *IP in the Octagon: Saving Live Sports from Digital Piracy*, IPWatchdog.com (Jan. 23, 2025), https://ipwatchdog.com/2025/01/23/ip-octagon-saving-live-sports-digital-piracy/id=185316/; See also Ampere Analysis, *Pricing Piracy: The Value of Action* (April 21, 2021), https://www.synamedia.com/whitepapers-reports/pricing-piracy-the-value-of-action/.

³ See, e.g., Larissa Knapp, *The Hidden Cost of Live Sports Piracy – And How We Fight Back*, Alliance for Creativity and Entertainment (Sept. 9, 2025), https://www.alliance4creativity.com/blog/the-hidden-cost-of-live-sports-piracy-and-how-we-fight-back/; See also Andy Maxwell, *ACE&DAZN Shut Down a Major Sports Piracy Site in a "DMCA Ignored" Country*, TorrentFreak (Sept. 10, 2025), https://torrentfreak.com/ace-dazn-shut-down-a-major-sports-piracy-site-in-dmca-ignored-country-250910/.

⁴ Andy Maxwell, *ACE Shuts Down Giant Piracy Ring, But The Original Survives*, TorrentFreak (Sept. 3, 2025), https://torrentfreak.com/ace-shuts-down-giant-streameast-piracy-ring-but-the-original-survives-250903/.

⁵ Andy Maxwell, *Operator of South Korea's Largest Pirate Site Sentenced to 3 Years in Prison*, TorrentFreak (June 4, 2025), https://torrentfreak.com/operator-of-south-koreas-largest-pirate-site-sentenced-to-3-years-prison-250604/.

Notorious Markets List—to permanently shut down the service, transfer the domains to ACE, and complete ACE's questionnaire on the operation of Diziwatch & Filmmax.

The American Motion Picture Industry Remains a Driver of Global Economic Activity

These victories enable the American motion picture and television industry to remain a major U.S. employer that supported 2.32 million jobs and \$229 billion in total wages in 2023. This includes 312,000 jobs in the core business of producing, marketing, and manufacturing motion pictures, television shows, and video content, as well as 544,000 jobs in the distribution of motion pictures, television shows, and video content to consumers, including people employed at movie theaters, television broadcasters, cable companies, and online video services. The industry also supports indirect jobs in the thousands of companies that do business with the industry, such as caterers, dry cleaners, florists, hardware and lumber suppliers, and retailers. This is a nationwide network of mostly small businesses representing every state in the country, with 92 percent employing fewer than 10 people.

The American motion picture and television production industry remains one of the most highly competitive in the world. In 2023, the enduring value and global appeal of U.S. entertainment earned \$22.6 billion in audiovisual exports. Today, there are over 1,000 legitimate streaming services around the world providing audiovisual content to consumers online, accommodating an array of consumer viewing preferences. Moreover, this industry is one of the few that consistently generates a positive balance of trade: in 2023, that services trade surplus was \$15.3 billion, or 6 percent of the total U.S. private-sector trade surplus in services.

As the industry distributes its films and television shows in over 130 countries and MPA member companies earn over half of their distribution revenue overseas, MPA has a strong interest in the health and sustainability of these international markets. MPA greatly appreciates USTR's interest in identifying notorious markets that jeopardize the growth of legitimate commerce and impair U.S. global competitiveness. The economic and cultural vitality of the creative industries is one of our nation's most valuable assets and it is critical that our trading partners protect and enforce copyright.

Evolving Technologies Continue to Impact the Fight Against Global Piracy

As we have previously noted in our submissions to USTR, content thieves provide or administer easy-to-use online piracy websites, apps, and services to distribute infringing content, usually for monetary gain. These sites and services often have the look and feel of legitimate content distributors, luring unsuspecting consumers into piracy. Moreover, most website operators operate anonymously and outside the boundaries of the law. Thus, it is imperative that all global stakeholders in the fight against online piracy—including hosting providers, domain name system providers, content delivery networks, reverse proxy and other anonymization services, registrars, registries, cloud services, advertising networks, payment processors, social networks, and search engines—work together to reduce support for notorious offenders.

The use of sophisticated technologies by content thieves continues to complicate our fight against online piracy. Many copyright infringing sites utilize two types of technology services to mask their Internet protocol (IP) address—i.e., the Internet location of their server—and the hosting provider of their website, to thwart enforcement efforts. The first type of service is a reverse proxy:

it funnels connections to many different websites through shared server(s) that then redirects the connection to its correct destination (which remains masked). The second is a content delivery network (CDN): it is typically used to efficiently deliver content to a global userbase by placing servers all around the world that store copies of that content, providing a high-speed infrastructure for some of the most popular Web streaming services. One of the consequences of using a CDN is that it masks the IP address and hosting provider of a website.

An example of a CDN and reverse proxy service frequently exploited by notorious markets to avoid detection and enforcement is Cloudflare. Cloudflare's customers include some of the most notorious, long-standing pirate websites in the world, including the massively popular streaming sites vegamovies[.]gmbh, cuevana[.]biz, and The Pirate Bay, whose current domain, thepiratebay.org, has been identified as infringing rightsholders' copyrights more than six million separate times.⁶ Additional examples of CDN and reverse proxy services frequently used by notorious markets to avoid detection and enforcement are DDos-Guard and OVH SAS (via OVHcloud). DDos-Guard is based in Russia and its customers include some of the world's most egregious pirate infrastructure sites, most notably the video hosting service Doodstream, discussed later in this filing and streaming sites such as bs[.]to and animeflv[.]net. OVH SAS is based in France and its customers include pirate sites, most notably cda[.]pl, chomikuj[.]pl, and streamtape[.]to. The Pirate Bay, Doodstream, and other notorious pirate sites remain customers despite repeated notices of infringement to these services.

A growing global threat is piracy from IPTV services that provide stolen telecommunication signals/channels and often on-demand infringing film and episodic content to a global audience via dedicated Web portals, third-party applications, and piracy devices configured to access the service. MPA has identified over 1,000 of these illegal IPTV services operating globally. As we note in this submission, MagisTV has emerged as a particularly notorious IPTV service, attempting to mask its illegitimacy in part by successfully registering its trademark in several markets around the world.

MPA's filing includes "Piracy-as-a-Service" (PaaS) as a category of notorious markets. PaaS is a subset of the larger threat of Cybercrime-as-a-Service, which was identified by Europol as a growing threat enabling a variety of cybercrimes. PaaS encompasses a suite of often off-the-shelf services that make it easy for would-be pirates without any technical knowledge to create, operate, and monetize a fully functioning pirate operation, such as website templates, databases of infringing content, and hosting providers specialized in servicing infringers. These services are evidence of the scale, sophistication, and profitability of modern online commercial copyright infringement.

This Year's Notorious Markets

The list of online markets below is not intended to be comprehensive but, rather, reflects an attempt to identify sites and services particularly illustrative of the current nature and scope of online content theft. When possible, we have attempted to provide the specific information requested in

⁶ Enter thepiratebay.org in the search bar of the Google Transparency Report's "Content delistings due to copyright" available at https://transparencyreport.google.com/copyright/overview.

⁷ Europol, *Internet Organised Crime Threat Assessment 2020*, https://www.europol.europa.eu/publications-events/main-reports/internet-organised-crime-threat-assessment-iocta-2020 ("Europol Threat Assessment").

the Federal Register Notice (FRN), including popularity rankings and site traffic volume data from SimilarWeb,⁸ as well as information on revenues where available, among other details. MPA has also attempted to respond to the FRN's request for information regarding any known enforcement activity, including by identifying jurisdictions that have issued blocking orders against the named piracy site or service. In all instances, blocking orders affect the availability of the piracy service in the specific territories in which the orders are issued; they do not affect the availability of such services extraterritorially.

In most instances, criminal enterprises and individuals work to obfuscate identifying information, such as hosting location, and they can hide behind anonymizing services with ease, as discussed above. With this in mind, MPA has aimed to identify each site's predominant location(s) based on several factors—including location of the server(s), Web host, or domain registrant. If these factors are unknown, we have referenced the market, site targets, or where the site or service draws a large share of its audience. China, India, Russia, and Vietnam are notable jurisdictions for these piracy services.

Linking and Streaming Websites

Linking sites aggregate, organize, and index links to content stored on other sites, largely deriving revenue from advertising and referrals. Like legitimate services, linking sites that offer unauthorized movies and television shows typically organize posts by title, genre, season, and episode and often use the official, copyright-protected cover art to advertise the content. The sites then provide one or more active links so users can access the infringing content. Depending on the website, users are commonly presented with the options of streaming or downloading the content. Many streaming link sites also frame or embed video players from third-party websites, reducing the number of clicks needed to get to content for a more seamless user experience while retaining the user to serve and monetize from advertisements or malware. Some of these sites also appear to be hosting the underlying content files on servers they control to maintain continuity of infringing offerings and to avoid takedowns on third-party, file-hosting sites.

There were several positive developments in the infringing linking and streaming ecosystem since the previous Notorious Markets submission. For example, the Streameast network of illicit sports live streaming websites that had been active since at least 2019 was shuttered. The primary domain of streameast[.]app had a peak of 40.68 million visits from 6.5 million unique visitors in April 2025 prior to enforcement action, according to SimilarWeb. Across all domains, the service attracted over 1.4 billion global visits in the past 12 months, making it the world's most popular illegal sports streaming network. A coordinated investigation by the MPA/ACE global team, supported by disclosure court orders, led to the identification of the operators in Egypt.

Egyptian authorities carried out synchronized raids targeting two individuals behind the piracy network operating the Streameast group of websites. Twenty-two police officers were deployed in the operation where authorities uncovered that the operators had established a shell company in the

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⁸ A SimilarWeb rank represents the approximate number of websites in the world whose popularity is higher than that of the given site: the more popular a site, the smaller the number. SimilarWeb also provides site traffic data that represents worldwide unique visitors on desktop and mobile for the last available month. SimilarWeb is a market intelligence company that uses a combination of panel, public data sources, ISP, and other data for its data estimations. See http://similarweb.com for more information. All data, reports and related materials provided or made available by SimilarWeb are intended for informational purposes only. They are based on data obtained from third parties, including estimations and extrapolations based on such data, and are not warranted for accuracy or completeness.

UAE, which they allegedly used to launder advertising revenues from the piracy sites. Following these findings, the two suspects are also being investigated for money laundering, which will likely have an impact on the subsequent court cases and penalties. The actions resulted in 173 domains (so far) being transferred to ACE's control, with additional transfers upcoming.

On another positive note, the Korean Ministry of Culture, Sports, and Tourism (MCST) Special Judicial Police arrested one operator of the Korean site TVWiki (formerly known as NoonooTV) on November 9, 2024, and seized the operator's websites TVWiki and OKTOON. TVWiki had been the most popular illegal streaming site in Korea. The sites regularly hopped domains to avoid site-blocking efforts. We applaud the actions of the MCST, working alongside Interpol through the Interpol-Stop Online Piracy Project, in taking down this notorious market.

Moreover, the Indian Courts continued building on the positive precedent set in 2023 in *Universal City Studios LLC & Ors vs. dotmovies.baby & Ors* by globally suspending hundreds of additional piracy domains including pirate brands like Vegamovies, Gogoanime, M4ufree, hdhub4u, hianime, bollyflix, lk21, and many others, removing billions of piracy visits from the Internet. These innovative orders also required domain name registrars to disclose "any details relating to the registrants of the said domain names including Know Your Customer, credit card, mobile number, etc."

As reflected below, MPA has listed the most significant global notorious linking and streaming sites in order of priority. We next list additional notorious sites of focus in alphabetical order.

Priority Notorious Linking and Streaming Sites

- Myflixerz / Sflix Vietnam. MyFlixerz and its associated domains including sflix[.]to sflix2[.]to, moviesjoytv[.]to, myflixerz[.]to, and hdtodayz[.]to, form one of the largest, currently active, piracy streaming networks. According to SimilarWeb, these sites together attracted more than 622 million visits in August 2025. The operators monetize their traffic primarily through aggressive advertising networks, pop-ups, and redirects. These sites rely on their own PaaS infrastructure (formerly known as 2embed[.]to, which ACE took down in June 2023) and despite enforcement, they continue to thrive through alternative domains and backend hosting on platforms such as MegaCloud, VidCloud, and RapidCloud. Unlike the previous CMS model, which explicitly enabled pirate sites to embed movies and monetize streams, this new model functions as a backend hosting network powering popular pirate domains such as those mentioned above. These services act as a media source server, serving video files directly allowing a myriad of sites to provide streams to users. They remain among the most visited piracy portals globally, offering free access to a vast library of movies and television shows. The operators are located in Vietnam.
- Cuevana[.]biz / Cuevana[.]is Venezuela. After the takedown of the original Cuevana-branded site, the Cuevana[.]biz/Cuevana[.]is group is currently the most popular streaming site group in Spanish-speaking Latin America and is one of the most popular streaming piracy site groups in the world, offering more than 19,000 titles including movies and television series. The websites have been active since at least 2020 and 2022,

⁹ Universal City Studios LLC & Ors vs. dotmovies.baby & Ors., CS(COMM) 514 of 2023.

respectively. Cuevana[.]biz received 10 million visits from 2.87 million monthly unique visitors, with a global rank of 208 while Cuevana[.]is received 38.47 million visits from 5.13 million monthly unique visitors, with a global rank of 57 and local ranks of 103 in Mexico, 127 in Colombia, 117 in Argentina, and 154 in Peru in August 2025, according to SimilarWeb. The websites' administrators monetize their infringing service through advertising served by many national and international ad networks. The hosting location is masked by Cuevana[.]biz group's use of Cloudflare's reverse proxy service but thought to be currently operating in Venezuela.

• Hianime[.]to, hianime[.]nz, hianime[.]sx, hianime[.]tv, hianimez[.]to, hianimez[.]is, hianime[.]bz, hianime[.]pe, hianime[.]cx, hianime[.]gs, hianime[.]do, kaido[.]to — Vietnam. Hianime, formerly known as Zoro[.]to and Aniwatch[.]to, has a global ranking of 159 with 244.2 million visits from 17.54 million unique visitors in August 2025, according to SimilarWeb. The site provides access to a range of content, especially anime content. The hosting location is masked using Cloudflare's reverse proxy, but the site is currently believed to be operated from Vietnam.

Additional Notorious Linking and Streaming Sites

- **1tamilmv** India. 1tamilmv is a popular India-based streaming/torrent website. Apart from providing torrent and magnet links on their main site (currently at 1tamilmv[.]blue), users can also stream content directly through 1tamilmv sites. To avoid blocking orders, it hops across multiple domains. 1tamilmv[.]blue received 25.18 million visitors from 2.05 million unique visitors in August 2025 and is currently ranked 2,228 globally and 250 in India, according to SimilarWeb.
- Animeflv[.]net Peru; Chile; Mexico. Animeflv[.]net is a Spanish-language streaming site dedicated to film and television anime content, believed to have been established in 2010. The site's catalogue is comprised of more than 350 films and more than 2,000 series. According to SimilarWeb, the site received more than 1.1 billion visits from August 2024 to August 2025 and is ranked 683 globally. In August 2025, the site received 70.35 million visits from 5.74 million unique visitors with local ranks of 63 in Mexico, 158 in Spain, 76 in Colombia, 82 in Chile, and 151 in Argentina, according to SimilarWeb. It uses the Russia-based hosting provider DDos-Guard's reverse proxy service to mask hosting location, but its operators are believed to be located in Peru, Chile, and Mexico.
- Anime-Sama[.]fr France. Anime-Sama is a French-language piracy site focused on anime content. In August 2025, the website had 37.46 million monthly visits from 3.27 million unique visitors with a local rank of 77 in France standing as the top ranked illegal service in France, according to SimilarWeb. The website uses multiple ad providers such as Adcash, Seedtag, and PropellerAds, to monetize its traffic. Additionally, it uses Cloudflare's reverse proxy service to mask the IP location of main domains and subdomains, but the domain is hosted by Private Layer INC in Zurich, Switzerland.
- **Bs[.]to** Germany. Bs[.]to is one of the most popular German illegal streaming websites and exclusively offers television series. According to SimilarWeb, the website is ranked 7,244 globally and 407 in Germany. In August 2025, the website had 9.6 million

monthly visits from 787,022 unique visitors, according to SimilarWeb. Most of the traffic originates from German-speaking countries with Germany (59 percent), Switzerland (15.5 percent), and Austria (8.27 percent) providing more than 80 percent of global traffic. The website offers 10,081 television series (not including individual episodes). Currently, the website is using the proxy services of DDos-Guard and their actual host IP address is unknown.

- **Buffstream[.]io** India. Buffstream[.]io is an English-language live sports piracy site that provides free live streaming of various sports events, covering popular sports such as NBA, NFL, MLS, MMA, and F1. It aggregates links from different sources, allowing users to access streams of live sports events without the need for a subscription. The site received 1.16 million visits from 397,768 unique visitors in August 2025 and received 75 percent of its traffic from the United States, according to SimilarWeb. The site is hosted by Amarutu Technology Ltd. located in the Netherlands, and its operators are believed to be in India.
- Cda[.]pl Poland. Cda[.]pl is Poland's most popular piracy website, with traffic levels eclipsing several legitimate video-on-demand (VOD) services in the country. Cda[.]pl had 12.88 million worldwide visits from 2.97 million unique visitors in August 2025, according to SimilarWeb. The site currently has a global SimilarWeb rank of 4,683 and a local rank of 111 in Poland. The operator of the website, CDA Spółka Akcyjna, uses Cloudflare's reverse proxy service to mask the IP location of the main domains and subdomains, but the main domain of Cda[.]pl is hosted by OVH SAS in France.
- Chomikuj[.]pl Poland. Chomikuj.pl has been operational since at least 2013 with 6.83 million visits from 2.15 million unique visitors with a local rank of 148 in Poland in August 2025, according to SimilarWeb. Chomikuj.pl is a high-volume host that avoids impact to its service from takedowns by permitting the prompt re-upload of content through third-party scripts and applications. Chomikuj.pl is hosted by OVH SAS and the operator of the website uses Cloudflare's services which mask the IP location of the website.
- Cineby[.]app Russia. Cineby is a fast-growing one-stop-shop piracy site in the "hydra site" category. These are a rapidly expanding category of one-stop piracy sites offering content somewhat comparable to IPTV services, but without the need for subscriptions or dedicated devices. These sites offer frictionless, browser-based access that requires no registration and does not include paywalls. They carry premium content, including prerelease Hollywood films, live/sports broadcasts, local content, anime, and more. Examples include: HydraHD, Nunflix, Cineby, Rivestream, Watchug, Vidbox, Broflix, Flickystream, Mapple, Alienflix, and Novastream. Cineby relies extensively on PaaS infrastructure, embedding "Videasy" for VOD and "Streamed" for live sports streams. Cineby was ranked 789 worldwide and received 68.8 million monthly visits from 8.91 million unique visitors, with the plurality of traffic share (37.6 percent) coming from the United States in August 2025, according to SimilarWeb. Cineby domains are hosted in Russia, have been blocked in Indonesia and Malaysia and, as a result, traffic has decreased in those markets.

- Dytt8899[.]com, dytt8[.]net, dytt89[.]com, dygod[.]net, dy2018[.]net, dy2018[.]com, dydytt[.]net, and ygdy8[.]com China; Taiwan. In August 2025, dytt8899[.]com, which was ranked 7,377 globally and 169 in China, received 7.9 million visits from 1.67 million unique visitors, according to SimilarWeb. With a user-friendly interface and the provision of direct links to third-party storage providers, this website remains a particular threat to legitimate services both within and outside China. Dytt8899[.]com is part of a group of related sites including btwuji[.]com, dytt89[.]com, dy2018[.]com, dy2018[.]net, dydytt[.]net, dytt8[.]com, dytt8[.]net, and ygdy8[.]com that redirect to, or promote one another. The sites were referred to the National Copyright Administration of China (NCAC) in 2025 again as part of its annual "Swordnet" campaign. Dytt8[.]net is blocked in Australia and Malaysia and dy2018[.]com is blocked in Malaysia.
- Gimy[.]ai Taiwan/China. In February 2024, more than three years since ACE brought a criminal referral against the piracy service GimyTV in December 2020, the Taipei District Court sentenced its primary operator to 26 months in prison, the site's programmer to 22 months, and two of its operators to 18 and 12 months. The case is currently on appeal. Despite enforcement efforts, the Gimy domains were not confiscated by the Taiwanese authorities, and Gimy continues to operate through multiple mirror sites and alternative domains including Gimy[.]ai (the current main domain), Gimy[.]video, Gimy[.]is, Gimy[.]im, Gimy[.]cc, and Gimy[.]tube. Gimy's global SimilarWeb rank is 1,332 and the site is extremely popular in Taiwan with a local rank of 26. The Gimy[.]ai website had 44.91 million monthly visits from 4.01 million unique visitors in August 2025, according to SimilarWeb.
- **Hydrahd[.]sh** Ukraine. Hydrahd is a rapidly expanding one-stop shop piracy site offering frictionless, browser-based access of large amounts of copyright infringing content. It does not require registration and has no paywalls. The site carries premium content, including prerelease Hollywood titles, live sports broadcasts, local content, anime, and more. The site depends heavily on PaaS infrastructure, notably "Vidsrc" for VOD and "Streamed" for live sports content. According to Similarweb data, Hydrahd was ranked 2,125 worldwide and received 28.27 million monthly visits from 2.43 million unique visitors, with the plurality of traffic share (33.8 percent) coming from the United States.
- **Kisskh[.]co, kisskh[.]ovh** India. Kisskh are a group of popular global piracy sites that specializes in Asian dramas and Hollywood content. The kisskh[.]co site has a global rank of 848 with 61.43 million visits from 4.34 million unique visitors while kisskh[.]ovh received 35.68 million visits from 1.43 million unique visitors with 94 percent of traffic originating in India in August 2025, according to SimilarWeb. The operator of the website uses Cloudflare's services which mask the IP location of the website.
- **Librefutboltv[.]su** Latin America. Librefutboltv[.]su is a widely popular illegal live sports streaming site. With a focus on Latin American soccer—especially leagues popular in Argentina and Chile—it also offers access to several other live sports streams

¹⁰ See, e.g., Taiwan: jail terms handed down to operators of GimyTV piracy sites, Piracy Monitor (Feb. 2, 2024), https://piracymonitor.org/taiwan-jail-terms-handed-down-to-operators-of-gimytv-piracy-sites/.



like the MLB and the NFL. The site received 52.82 million visits from 11.38 million unique visitors in August 2025, according to SimilarWeb. The site ranks 712 globally and 58 in Chile, 67 in Mexico, and 46 in Colombia in August 2025, according to SimilarWeb. The hosting location is masked by Cloudflare's reverse proxy service.

- LiveTV[.]sx Europe. Livetv[.]sx is one of the world's most popular illegal live sports streaming sites. Operating since 2007, the site offers access to a wide variety of sports, including top European football leagues (Premier League, La Liga, Serie A, Bundesliga, Ligue 1, Liga Portugal), UEFA club competitions, MLS, and international qualifiers, as well as the NBA, NFL, NHL, MLB, ATP/WTA tennis, Formula 1, MotoGP, PGA Tour, UFC, and PPV boxing. Livetv[.]sx attracted 15.1 million visits from 3.38 million unique visitors in August 2025, with the plurality of traffic (30 percent) coming from Germany, according to SimilarWeb.
- Netmirror India. This app is available on both Android and desktop designed to mimic the Netflix user interface to attract users. The app provides unauthorized access to movies and television shows from major subscription platforms such as Netflix and Amazon Prime. Distributed outside official app stores, it requires sideloading and often enabling "unknown sources," further raising security concerns. NetMirror operates through associated domains including netmirror[.]app and net2025[.]cc which host downloads and promote the service. Netmirror[.]app had 12.76 million visits from 4.98 million unique visitors in August 2025, according to SimilarWeb. These apps/websites provide access to a range of content including movies and series. The operators are suspected to be based in India.
- Nunflix[.]org Bahrain. An internationally expanding one-stop piracy site with an easy-to-use, browser-based access model: "no registration, no paywalls, just a single click." Like other "hydra sites" such as Cineby and Hydrahd, Nunflix gives unlawful access to large-scale premium content, including prerelease Hollywood films, live sports, local material, and anime. The site also relies on PaaS providers, embedding "Vidsrc" for VOD and "Streamed" for live sports content. According to SimilarWeb data, Nunflix was ranked 4,415 worldwide and received 12.22 million monthly visits from 1.31 million unique visitors globally, with a plurality of traffic share (47.8 percent) coming from the United States.
- Redecanais / Redecanaistv / Futemax Brazil. Redecanais is a popular brand of illegal streaming websites that also offers IPTV services. These domains (redecanais[.]ps, redecanais[.]ee, redecanaistv[.]gs, redecanaistv[.]ee, and futemax[.]mn) together received more than 137 million visits from September 2024 to August 2025 with the main domain, redecanais[.]gd receiving 16.42 million visits from 2.16 million unique visitors in August 2025, according to SimilarWeb. They are targets of blocking orders in Brazil; however, they remain active and continuously create new domains to continue operating. The service offers more than 2,000 pages of content, such as movies, television series, anime, and live television channels.
- Rezka[.]ag Ukraine. Formerly known as hdrezka[.]me, rezka[.]ag is a popular Russian-

¹¹ See, e.g., AnaBlock – Blocks on the Brazilian Internet, https://anablock.net.br/view-order.php?oid=20240223001.

language streaming website that offers over 55,000 movies and 16,600 television series, including cartoons and anime. According to SimilarWeb, rezka[.]ag received 38.79 million visits from 7 million unique visitors in August 2025 despite site-blocking orders in multiple jurisdictions including Ukraine, Russia, Indonesia, Spain, and Brazil. Rezka is also a dubbing studio with their audio tracks well known in the Russian market and spread across multiple other streaming and torrent websites.

- **s[.]to** Germany. s[.]to is a German streaming website offering only television series. The website—currently ranked 6,415 globally and 359 in Germany—attracted 11.89 million visits from 756,700 unique visitors in August 2025, according to SimilarWeb. The website offers episodes for 10,112 television series. The hosting location is masked using DDos-Guard's reverse proxy service.
- Soap2day[.]day Russia. Soap2day[.]day is an English-language streaming site—believed to be operated out of Russia—that offers thousands of film and television titles for streaming and direct download. The site received 23.49 million visits from 3.99 million unique visitors in August 2025, according to SimilarWeb.
- Streamingcommunity Italy. In December 2024 the domain streamingcommunity[.]computer ranked 8 in Italy, with 112 million visits from 6 million unique visitors, according to SimilarWeb. Following an MPA civil site blocking action, the website dropped significantly in traffic and rankings. Pay August 2025, SimilarWeb data showed that the service had restructured its infrastructure. A new ring of sites was collected after it was observed that many related domains had surfaced. The service now operates under three main rings: streamingunity[.]co, streamingcommunityz[.]online, and animeunity[.]co, all of which share either identical IP addresses or the same hosting provider. Streamingunity[.]co received 12.32 million monthly visits from 1.02 million unique visitors, with 87 percent of traffic originating from Italy in August 2025, according to SimilarWeb. Criminal investigations are ongoing in parallel with weekly site-blocking measures. On its Telegram channel, the operators are encouraging the use of alternative DNS services to circumvent site-blocking measures and have started promoting their PaaS.
- Vegamovies India. Vegamovies is one of the most popular piracy streaming sites in India with at least 40 known associated domains including vglist[.]nl and vegamovies[.]hot. Vegamovies domains are regularly blocked through court actions, but they hop and proliferate such that traffic is dispersed and in August 2025, vegamovies[.]gmbh was ranked 500 in India and 5,458 globally, with that domain responsible for 9.73 million visits from 1.33 million unique visitors, according to SimilarWeb. The site is in English and known for providing unauthorized access to a wide range of international movie and television content, as well as India-based content. Vegamovies' domains distribute content through cyberlockers and drive-to-drive source domains such as FilePress and GdToT, which transform GDrive links into a player with multiple hosts. The site frequently changes its domain name to evade blocking orders and enforcement efforts and has multiple sources of revenue including advertising. The

¹² See, e.g., Streaming Community website continues to be blocked in an effort to combat piracy, Skytg24 (May 20, 2025), https://tg24.sky.it/tecnologia/2025/05/20/streaming-community-lotta-pirateria.

operators of Vegamovies are believed to be based in India. The hosting location of Vegamovies' domains are masked by the use of Cloudflare's reverse proxy service.¹³

- Veronline[.]in Latin America. The initial domain identified for the service, veronline[.]cc, has been active since 2023. Following a period of redirection to veronline[.]sh, the domain has transitioned to veronline[.]tax, veronline[.]blog, and veronline[.]love in 2025. Veronline[.]tax had 562,666 visits from 104,172 unique visitors in August 2025, according to SimilarWeb. The service is dedicated to streaming television shows with significant traffic from Spain (38.37 percent), Mexico (12.69 percent), and Colombia (9.22 percent), among others. The website's operators monetize it through advertising provided by various national and international ad networks. Hosted by Namecheap, Inc., veronline[.]tax uses Cloudflare's services to mask its IP location.
- ww1[.]goojara[.]to / levidia[.]ch / Supernova[.]to Indonesia. Goojara is an Indonesia-based, English-language streaming website popular in Africa and the U.S. It comprises seven sites: goojara[.]to, levidia[.]ch; supernova[.]to, goojara[.]ch (which redirects to goojara[.]to), wootly[.]ch, and nebula[.]to. According to SimilarWeb data, goojara[.]to received 36.06 million monthly visits from 3.98 million unique visitors in August 2025. Goojara[.]to is blocked in Indonesia, Malaysia, India, and Australia. Levidia[.]ch is blocked in Malaysia, the United Kingdom, Australia, and Italy.
- Xalaflix[.]gg / xalaflix[.]art France. A French-language piracy platform with a sleek, fast, and easy-to-use interface, offering films dubbed in French and targeting exclusively French-speaking audiences. The site frequently changes its domain name to evade blocking orders and enforcement efforts and has multiple sources of revenue including advertising and subscription plans. Currently operating across five domains—including one that simply redirects to active mirrors—the primary domain xalaflix[.]gg received 14.28 million visits from 1.70 million unique visitors with 84.89 percent of traffic originating from France. It has a local rank of 180 in August 2025, according to SimilarWeb. In addition to pirated films from many studios, the site also advertises access—depending on the chosen paid plan—to Canal+ and other premium streaming video on demand (SVOD) services, as well as live television channels for subscribers.

Piracy-as-a-Service (PaaS)

PaaS offerings constitute a suite of off-the-shelf services that make it easy for would-be pirates to create, operate, and monetize a fully functioning piracy operation. PaaS providers lower the barriers to entry into commercial piracy. They include in particular: (i) content management systems (CMS), which are databases providing access to tens of thousands of infringing movies and television series, in exchange for the payment of a fee or a cut of the advertising revenue; (ii)

the end user's drive account.

¹³ Drive-to-drive is a method of copying files directly between a hidden master resource drive and the downloader. A website for a Cloning Tool, which enables copying of files directly between the hidden master resource on a storage drive, and the target account of a willing user, provides "access" to copyrighted content by way of a binary file. An attempt to "download" results in enabling the Cloning Tool which intends to deliver the file not to the user's desktop but to their drive. The pirate file is physically located on a drive account of the owner of the pirate solution. The precise location of that file on the drive is unknown, and a direct link is never revealed. The way to obtain the file is via the Cloning Tool's domain. After granting the permission, the file is copied directly into

dashboards that allow an illegal IPTV operator to oversee the infrastructure and operation of their service (including monetization, content-hosting servers, and user interactions); (iii) hosting providers that provide a safe haven for pirates because they do not respond to DMCA notices of copyright infringement (for examples, see the Hosting Providers section on pages 25 and 26); (iv) video hosting services that obscure links to infringing content (instead of providing a single web link for each piece of content, a PaaS video host may split the content across dozens of different links to make takedown efforts more difficult, while still allowing a streaming site to seamlessly reassemble and deliver the full content to users); (v) website templates that facilitate setup of streaming websites; (vi) domain-name obfuscation services that anonymize the registration and procurement of domain names in an effort to thwart registries' terms of service; and (vii) decentralized streaming software that acts as a third-party tool between a streaming site and a cyberlocker or video host, allowing for quicker upload of content with a large variety of cyberlockers and video hosting services.

PaaS is a subset of the larger threat of Cybercrime-as-a-Service identified by Europol, which has noted that illegal online activities are "increasingly enabled" by third-party tools that make these crimes feasible for even technically inexperienced criminals. ¹⁴ PaaS is evidence of the scale, sophistication, and profitability of modern online commercial copyright infringement.

MPA lists Notorious PaaS providers of focus below in alphabetical order.

- Fire Video Player Türkiye. Fire Video Player is software which allows webmasters to set up and manage their own video streaming servers. It offers various simple-to-use services to source content hosted on Google Drive, Google Photo, and Ok[.]ru. This PaaS has at least 98 sites using the service directly, totaling over 50 million visits in July 2025, according to SimilarWeb, including popular sites such as idlixku[.]com and ohli24[.]com. The developer and operator has been identified in Türkiye.
- MegaCloud / VidCloud / RapidCloud (formerly known as 2embed[.]to) Vietnam. Active since 2022, these hosting platforms—formerly operating under 2embed[.]to before it was taken down by ACE in June 2023—now serve as the primary PaaS infrastructure for some of the world's largest illegal streaming sites, including sflix[.]to, sflix2[.]to, moviesjoytv[.]to, myflixerz[.]to, and hdtodayz[.]to. The network maintains a content library of at least 46,000 movies and 16,000 television series, supporting more than 260 piracy streaming sites. In July 2025, these sites collectively attracted over 600 million visits, according to SimilarWeb. Unlike the earlier CMS model, which offered embedding tools and ad monetization options, the current system acts as a backend hosting network delivering infringing video files directly. These platforms form the backbone of the piracy ecosystem enabling massive global reach despite repeated enforcement efforts. The operators are based in Vietnam.
- Njal[.]la or 1337 Services Saint-Kitts & Nevis; Costa Rica. Njalla (located at njal[.]la) acts as an intermediary for domain-name registration purposes, procuring and owning domain names on behalf of others to provide them with anonymity. Njalla was founded and is owned by Peter Sunde, a founder of The Pirate Bay. 1337 Services LLC, the company behind Njal[.]la, is based in Nevis while the Njalla SRL entity is registered in

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¹⁴ Europol Threat Assessment at p. 16.

Costa Rica. Njalla is prominent among pirate services, with customers such as hydrahd[.]io and gogoanimes[.]fi.

- Streamed[.]su Russia. This relatively new PaaS provider is growing very quickly with its user base rising sharply from an estimated 29 piracy service users with a total 134 million visits in July 2025 to 41 piracy service users with a total 157 million visits in August 2025, according to SimilarWeb. A significant number of top pirate sites relying on this PaaS are so-called "hydra sites." These are a rapidly expanding category of one-stop piracy sites offering content somewhat comparable to IPTV services, but without the need for subscriptions or dedicated devices. These sites offer frictionless, browser-based access that requires no registration and does not include paywalls. They carry premium content, including prerelease Hollywood films, live/sports broadcasts, local content, anime, and more. Examples include: HydraHD, Nunflix, Cineby, Rivestream, Watchug, Vidbox, Broflix, Flickystream, Mapple, Alienflix, and Novastream. Streamed offers embeddable players with live sports. None of its sites host live content themselves; all traffic flows through the PaaS, which relies entirely on its own infrastructure. It has also introduced live viewer counts, offering a useful way to gauge audience interest in real time.
- Videasy[.]net Global. Videasy[.]net is a free-to-use, ad-supported, video embed API providing a player with its own content library containing more than 72,000 movies, 14,000 series, and 4,000 anime titles. This PaaS has at least 163 sites using the service directly, totaling over 314 million visits in July 2025, according to SimilarWeb, including popular sites such as cineby[.]app, hydrahd[.]sh, and flixbaba[.]com.
- Vidlink[.]pro Global. Vidlink[.]pro, launched in August 2024, provides a free-to-use player with a ready-made and regularly updated content library comprised of over 100,000 movies, 70,000 series, and 5,000 anime titles. This PaaS has at least 151 piracy sites using the service directly, totaling over 207 million visits in July 2025 according to SimilarWeb, including popular sites such as hydrahd[.]sh, cuevana[.]pro, and nunflix[.]pro.
- Vidsrc[.]me Morocco. This is a pirate video embed application programming interface (API) which offers a large library of audiovisual content consisting of over 86,000 movies and 19,000 series. It operates by providing a video player to integrate on any website using simple HTML code. Pirate site operators can either use the service for free, in which case Vidsrc remunerates itself by inserting ads, or use its paid service that allows ad-free streaming. This PaaS has at least 667 sites using the service directly, totaling over 637 million visits in July 2025 according to SimilarWeb including popular sites such as hydrahd[.]sh, goojara[.]to, and fmovies[.]co. The hosting location is masked using Cloudflare's reverse proxy service. Most hydra sites depend heavily on PaaS infrastructure, often embedding "Vidsrc" for VOD and/or "Streamed" for live (sports) content. Examples include: HydraHD, Nunflix, Rivestream, Watchug, Vidbox, Broflix, Flickystream, Mapple, Alienflix, and Novastream.
- WHMCS Smarters India. WHMCS Smarters is an IPTV turnkey solution. Its IPTV software solution offers website design and development, customized apps on several platforms (including iOS, Android, and Windows), and a billing platform. It also offers

an IPTV media player through the IPTV Smarters Pro app. The IPTV Smarters Pro app and WHMCS Smarters were developed by New Spark Technology, a company based in Mohali, India.

Direct Download Cyberlockers and Streaming Video Hosting Services

Direct download cyberlockers and streaming video hosting services are websites that provide centralized hosting for infringing content and are commonly leveraged by linking sites to provide their illicit inventory. These services allow users to upload infringing files, and users can then disseminate the corresponding web links—which enable either downloads (from cyberlockers), streams, or both—across the Internet via linking sites, mobile and other web applications, social media platforms, forums, blogs, and/or email. Complicating enforcement, cyberlockers and video hosting services frequently provide several unique links to the same file and use proxy services to mask the locations of where the site and content are hosted. If a content owner sends an infringement notice for one of the links—and that link is then removed—but the underlying file is not removed, the other links may remain active, enabling continued infringement. Cyberlockers and video hosting services often do not present any search function, necessitating discovery elsewhere on separate websites. Many cyberlockers and video hosting services do not respond to takedown notices.

The cyberlockers and video hosting services listed below include examples of both direct download and streaming models. By making vast amounts of infringing premium content available to the public, these sites attract vast amounts of traffic. MPA's highest priority sites are listed immediately below and are ordered by importance. These four priority sites are then followed by additional notorious sites that are listed in alphabetical order.

Priority Notorious Direct Download Cyberlockers and Streaming Video Hosting Services

• **Doodstream (doodstream[.]com)** – India. Doodstream with at least 40 known associated websites (e.g., doodstream[.]com, dood[.]stream, doods[.]pro, dood[.]yt) is an illegal video hosting service relied on by over 660 popular illegal streaming websites and receiving traffic from a network of over 10,000 sites due to its hosting capabilities. Doodstream pays users to upload popular (including copyrighted) content onto Doodstream, which can be disseminated through web links on illegal streaming websites and other platforms. The service has also implemented various tools that allow its uploaders to evade takedown and enforcement efforts. One of the largest illegal video hosting services in the world, Doodstream received massive traffic of at least 2.69 billion visitors across the various Doodstream domains in 2024. In August 2025, doodstream[.]com, which was ranked 40,798 globally, received 2.85 million monthly visits from 1.53 million unique visitors, according to SimilarWeb. In March 2024, a group of Plaintiffs including MPA members filed a lawsuit against Doodstream in the Delhi High Court. In May 2024, the Court granted an interim injunction against the operators of Doodstream, though the domains are still active, and the Defendants have

¹⁵ See, e.g., Andy Maxwell, Court Bans DoodStream's Owners & Associates From Running the Site, TorrentFreak (June 8, 2024), https://torrentfreak.com/court-bans-doodstreams-owners-associates-from-running-the-site-240608/.

failed to comply with the court's orders. ¹⁶ Various Doodstream domains have been blocked in France.

• Telegram – UAE. Telegram is an instant messaging service available on computer and mobile devices for Windows, iOS, Android, and Linux and allows its users to create channels and groups, upload and share content, and run livestreams. In early 2024, the founder of Telegram remarked that the platform boasts 900 million monthly active users worldwide. Telegram, which is headquartered in Dubai, is known for its strong emphasis on privacy and security, with features like encrypted chats and calls. It allows users to send messages, photos, videos, and files of up to 2 GB, and hosts channels for broadcasting to unlimited subscribers and large groups up to 200,000 users. However, the same features that enhance its privacy and security also make it a tool that is structurally used for piracy and copyright infringing content. 18

The encrypted and private nature of communications on Telegram complicates the enforcement of copyright laws as this protects the anonymity of uploaders. Additionally, channels with large subscriber counts and no subscriber limits can distribute infringing content to vast audiences, and the non-centralized distribution of files allows for rapid sharing and replication of such material. These factors have made Telegram a notable platform for sharing pirated content.

While there have been improvements in compliance rates for the removal of infringing links and channels, Telegram's response to takedown notices varies greatly, from almost immediate to none despite multiple re-notifications. Furthermore, instances of online piracy accessed through Telegram remain high overall due to the ease with which the same content can be uploaded to channels, discovery of infringing content that is facilitated by piracy bots, and inconsistent enforcement of its repeat infringer policy (as mentioned above; enforcement is challenging due to the encrypted and private nature of the communications, which complicates enforcement not just for law enforcement, but even for Telegram itself). In 2020, 2022, and 2025, the European Commission placed Telegram on its *Counterfeit and Piracy Watch List*. ¹⁹ Enforcement actions have been brought successfully in India, Israel, Italy, and Portugal requiring Telegram to provide

¹⁶ See, e.g., Andy Maxwell, Doodstream Can't Comply With Court Orders, Major Investor is a Russian Dude, TorrentFreak (Jan. 9, 2025), https://torrentfreak.com/doodstream-cant-comply-with-court-orders-major-investor-is-a-russian-dude-250109/.

¹⁷ Matthew Broersma, *Telegram Reaches 900m Users, Nears Profitability*, Silicon (March 12, 2024), https://www.silicon.co.uk/e-marketing/socialmedia/telegram-ipo-554058.

¹⁸ Ernesto Van der Sar, *Piracy Bots Chanels Are Rampant on Telegram But For How Long*?, TorrentFreak (May 19, 2023), https://torrentfreak.com/piracy-bots-and-channels-are-rampant-of-telegram-but-for-how-long-230519/ ("Initially, Telegram did not respond to notice and takedown requests, says Jan van Voorn, Head of ACE and Chief of Global Content Protection at the MPA. Since then, Telegram has improved its effectiveness and as things stand today the majority of all takedown requests are processed within a day. "We have been focused on improving their [takedown notice] compliance and now have over 130,000 enforcements on Telegram with over a 90 percent removal rate, including many infringements removed within 24 hours," van Voorn says. ACE also notes, however, that results are inconsistent and there's still a lot of progress to be made in order to successfully crack down on piracy channels, bots, and repeat infringers. [...] ACE has established cooperation to address urgent escalations and has continued outreach to seek further improvements in removing infringing channels, disrupting piracy bots, and terminating services to repeat infringers," Van Voorn explains. If this cooperation is successful, it may eventually become harder for pirate channels to survive. At least the ones with hundreds of thousands of members. That's not the case today, however ...").

¹⁹ See, e.g., European Commission, Commission Staff Working Document, Counterfeit and Piracy Watch List 2022, p.12,

operator information and block access to infringing content. Telegram is a platform of immediate concern.

- Streamtape[.]com France. Streamtape is a video hosting service offering unlimited storage and bandwidth. Streamtape operates a partner program, through which it is possible to earn a fixed amount per 10,000 downloads or streams, depending on the country of origin. As a result, this platform has become a popular place for the unauthorized sharing of media content. Streamtape[.]com had 13.6 million visits from 6.02 million unique visitors in August 2025, according to SimilarWeb. On January 17, 2024, 7 streamtape domains were blocked by French authorities for 18 months: streamtape[.]cc, streamtape[.]com, streamtape[.]net, streamtape[.]site, streamtape[.]to, streamtape[.]xyz, and tapecontent[.]net. Streamtape is hosted by OVH SAS in France.
- Voe[.]sx Belize. Voe can be accessed through various domains and makes content available to the public without authorization, either continuously or via download links. The cyberlocker allows users to upload and store videos as well as share access links, often through third-party indexing sites. These link collection sites, frequently subject to blocking orders, redirect users to Voe content without changing the interface. In France, courts found that Voe unlawfully communicated works to the public under Article 3(1) of Directive 2001/29, applying the CJEU YouTube/Cyando case law criteria. The judgment highlighted that Voe knows illegal content is massively shared via its platform, fails to implement effective anti-infringement measures, and encourages infringements by offering tools and a financial model that promote large-scale illegal sharing.²⁰

Additional Notorious Direct Download Cyberlockers, Streaming Video Hosting Services, and Related Services

Baidu Wangpan – China. Baidu Wangpan, or pan.baidu[.]com is a cloud storage service operated by Baidu, the largest search-engine provider in China. Users of this service can share links to files stored on their accounts with other users, and infringing content is reportedly disseminated widely through social media and other piracy linking sites. Although Baidu has several tools to take down unauthorized content, according to rightsholders, procedures for filing complaints are applied unevenly and lack transparency, and more recently, rightsholders are now required to provide copyright certificates which is further complicating and delaying an already-uneven procedure. Takedown times are reportedly inconsistent and quite lengthy for a platform of its scale, and rightsholders often must repeatedly follow-up with Baidu to ensure that pirated content does not reappear on the platform. In August 2025, pan.baidu[.]com received 90.23 million monthly visits from 25.62 million unique visitors, according to SimilarWeb. There has been little progress in Baidu's actions to suspend or terminate repeat infringers. Baidu Pan was sued by a television program producer/distributor in 2021. An appeals decision in 2024 disappointingly reduced the level of damages awarded, although it codifies potential liability if Baidu Wangpan is notified of

 $\frac{\text{https://circabc.europa.eu/ui/group/d0803128-7d62-40ee-8349-c43ee92745aa/library/b36f701d-2850-4768-9b3e-e487140e11e5/details?download=true.}$

²⁰ Tribunal judiciaire [Judicial Court of Paris], Nov. 15, 2024, 24/13155 (Fr.).

infringement and refuses "stay down" of the content. Baidu Pan was not required to entirely remove the infringing content from its server.²¹

- Rapidgator (rapidgator[.]net) Russia. Rapidgator, launched in October 2011, is a major platform for distributing infringing content, including prerelease material. It operates via rapidgator[.]net and rg[.]to, which redirects to the main site. Registered under Whois Privacy Corp. in Nassau, Bahamas, and hosted by Melbikomas UAB in The Netherlands, its operators are obscured behind offshore companies. Rapidgator had a global ranking of 1,782 and 28.42 million visits from 6.40 million unique visitors in August 2025, according to SimilarWeb. Rapidgator generates revenue from premium accounts, on-page advertising, pop-under advertisements, and possibly malicious payper-install schemes. Rapidgator's reward program encourages the distribution of copyrighted and prerelease content by compensating uploaders based on download traffic and premium account referrals. Despite offering takedown mechanisms, the platform fails to prevent repeat infringements. Removed content often reappears, and nearly 58 million URLs have been delisted by Google, highlighting the scale of infringement. In 2018 and 2019, German courts found Rapidgator liable for copyright infringement, a 2019 Russian court ordered ISPs to block access, as well by French court in July 2025. Despite its inclusion by USTR every year since the 2014 Notorious Markets list, the platform continues to operate with minimal compliance.
- VK[.]com Russia. VKontakte, or VK[.]com, is the leading social networking site in Russia and Russian-speaking territories and is a source of illegal distribution of movie and television files. Searching for content is relatively easy and the site supports streaming playback through embedded video players. In August 2025, VK[.]com which was ranked 30 globally and 5 in Russia received 968.3 million monthly visits from 99.67 million unique visitors, according to SimilarWeb. VK's response rate to takedown notices is low and they continue to be a significant infringement hub; MPA and its member companies continue to find thousands of infringing files on the site each month. Available worldwide in multiple languages, including English, it is one of the most visited sites in the world. VK Group, the parent company of VK, has in the past demonstrated its intention to improve copyright protection. This included joining a voluntary anti-piracy memorandum of understanding (MOU) in November 2018 and implementing a content filtering system that allows rights holders to search for and remove infringing content. However, since 2022, VK's compliance with takedown notices has fluctuated, with inconsistent results at times dropping to 30 percent and below by 2024. Russian legislation to replace the MOU process is pending and is reportedly being deprioritized by government stakeholders due to a lack of support from local rightsholders who trust the existing MOU process. The site operates on corporateowned servers in Russia.

Illegal IPTV Services

Illegal IPTV services typically offer hundreds of channels illegally sourced from providers worldwide, alongside libraries of VOD content that includes unauthorized copies of movies and

²¹ See, e.g., Baidu indirectly liable for copyright infringement of TV series, Chinese court rules in retrial, MLex (June 11, 2024), https://www.mlex.com/mlex/articles/2197936/baidu-indirectly-liable-for-copyright-infringement-of-tv-series-chinese-court-rules-in-retrial (article is behind paywall).

television series. Many of these services offer monthly or yearly subscriptions. IPTV services have been a driving force in the emergence of several related illegal businesses including ones engaged in (i) the resale of IPTV services and (ii) the theft, distribution, and sale of channel feeds.

IPTV services must rely on a vast and complex infrastructure and support services—which makes the identification of content sources and service operators extremely challenging—including hosting providers, media servers, and panel hosting. Some of these services are used without the knowledge or approval of the service provider. The marketing and sale of IPTV services is often carried out by a growing network of global IPTV service resellers who purchase subscriptions at wholesale prices and resell them for a profit, further complicating investigations. A 2020 study found that the estimated profit margins range from 56 percent for retailers to 85 percent for wholesalers. The resellers are also often involved in the promotion and support of the service, with many illegitimately sourcing a limited number of unauthorized channels for a given service. Many of the websites below provide no other functions than purchasing the service, such as providing content, tech support, or updates. We believe that the actual subscriber audience of these services are significantly higher than the SimilarWeb data would suggest. Once a user has purchased a subscription, the user accesses the infringing content on third-party media players, and this access is not counted by SimilarWeb.

A positive development in the IPTV ecosystem since the previous Notorious Market submission is the conviction of the operator of GlobelPTV in Lebanon.²⁴ GlobelPTV was a large-scale illicit IPTV content supplier that provided unauthorized access to 1,649 live television channels, including 104 sports channels, serving as a backbone for numerous illegal IPTV services worldwide. The service drew significant international traffic, with its top user bases in the United Kingdom (22.7 percent), the United States (19.4 percent), and Germany (12.7 percent). ACE's prior enforcement against Vader Streams in Canada in 2019 had already identified GlobeIPTV as a key content source for illegal IPTV platforms. Law enforcement evidence confirmed that nearly USD 1.95 million had been wired to the operator's account over the past two years, demonstrating the commercial scale of the operation. Following a knock-and-talk action in Lebanon in August 2022, ACE filed a criminal referral in October 2022, and in March 2025 the Beirut Sole Criminal Judge convicted the operator, sentencing him to 11 months' imprisonment (extendable if the fine is not paid) and imposing a criminal fine of approximately USD 2,500.²⁵ Civil damages have also been awarded to the claimants. This conviction represents a strategically significant disruption, as disabling GlobeIPTV cuts off a major source of pirated content for numerous illegal IPTV platforms.

MPA's highest priority sites are listed immediately below and are ordered by importance. These two priority sites are then followed by additional notorious sites that are listed in alphabetical order.

²⁵ *Id*.

²² Panel hosting is the ability to buy the backend of the IPTV service and customize the design of the frontend.

²³ Digital Citizens Alliance and NAGRA, *Money for Nothing: The Billion-Dollar Pirate Subscription IPTV Business* (August 2020), p. 2., https://www.digitalcitizensalliance.org/clientuploads/directory/Reports/DCA-Money-for-Nothing-Report.pdf.

²⁴ See, e.g., Andy Maxwell, *Premier League, Sky & ACE Celebrate Elusive GlobeIPTV Prison Sentence*, TorrentFreak (June 25, 2025), https://torrentfreak.com/premier-league-sky-ace-celebrate-elusive-globe-iptv-prison-sentence-250325/.

Priority Notorious Illegal IPTV Services

- MagisTV / FlujoTV Latin America; China. MagisTV is one of the largest IPTV brands in the world, offering over 1,200 channels and 50,000 VOD titles. The service is distributed through multiple resellers and websites with magistv[.]ai being one of the main services for purchasing subscription packages and downloading the app. That domain received 44,645 visits in August 2025 from 16,834 unique visitors, according to SimilarWeb. Magistv[.]ai has been active since 2024 and is using Cloudflare's services to mask its IP location. There are active criminal cases against MagisTV in Ecuador (oficialmagistv[.]com and magistv[.]digital), Colombia (magistv[.]la, magisla[.]com, magistvoficial[.]com), Venezuela (magistv-venezuela[.]com), and Argentina (magispro[.]lat). It has successfully managed to register its trademark in several Latin American countries following efforts to do so in Ecuador and Bolivia highlighted last year. FlujoTV is a side brand created and managed by MagisTV. FlujoTV is most focused on IPTV reselling domains while the majority of MagisTV domains are now APK download domains. Approximately 1,000 MagisTV domains have been created while the newer brand, FlujoTV, has less than 300 domains registered.
- Gogo IPTV Algeria. Operating since 2017, Gogo/Orca is a provider of IPTV subscriptions, preloaded Set Top Boxes (STB) with infringing card sharing ("CCCam") and IPTV apps. The IPTV service is popular in Europe and Algeria with at least 11,000 users. Gogo/Orca offers more than 6,000 live television channels from all around the world, and a VOD library of television series and movies in French and the original version, consisting of approximately 5,600 movies and 56,000 television series affecting many IP rightsholders including all MPA members. The suspected operators are in Algeria, where the case was referred to the cybercrime brigade of the national police in Algiers.

Additional Notorious Illegal IPTV Services

- Apollo Group TV Netherlands. Apollo Group TV is a piracy group and service that has been active since at least 2016. It began as an add-on app for the Kodi media player, before fully transitioning to a full-service IPTV and VOD provider. The site serves only as a download and subscription point for the IPTV service, rather than being where users access unauthorized content, and attracted approximately 370,307 visits in August 2025, according to SimilarWeb. The Apollo Group TV service is hosted by Digitalocean-ASN in the U.S.
- Atlas Pro Algeria. Atlas Pro is a long-standing and well-known IPTV provider. There are over 10,900 international channels and an extensive VOD library, with over 18,000 movies and 189,000 television series with full seasons and episodes. The service is distributed through multiple resellers across many domains with the primary being atlaspro[.]in. According to SimilarWeb, traffic to the website in August 2025 was 54,595 visits from 9,564 unique visitors. As the website provides no other functions such as providing content, tech support, or updates, we believe that the actual subscriber audience of this service is significantly higher than the SimilarWeb data would suggest. Once a user has purchased a subscription, the user accesses the infringing content on third-party media

players, and this access is not counted by SimilarWeb. The suspected operator is based in Algeria.

- GenIPTV Switzerland; North Macedonia. As one of the largest IPTV providers in the world, GenIPTV has over 16,000 international channels and 100,000 VOD titles. The support forum of the service accumulated approximately 25,000 visits and 12,000 unique visitors in August 2025, according to SimilarWeb, which is highly underestimated given the service's multiple resellers. UK-based Bandwidth Technologies hosts their front-end domain (geniptv[.]com), and the forum domain (geniptv[.]net) is hosted at Network Dedicated SAS in Switzerland. The suspected operators are in Switzerland and North Macedonia.
- **Spider Receiver** Jordan. Spider Receiver is an IPTV service selling multiple IPTV subscriptions and preloaded devices in the Middle East and North Africa region. It offers approximately 10,000 channels and 50,000 VOD titles from multiple rightsholders. There are 90,000 to 150,000 confirmed subscribers, and the service has two physical shops in Amman, Jordan. Their prices range between \$10 and \$40 per month.
- TVExpress[.]com[.]br Brazil; China. TVExpress is one of the largest IPTV brands in Latin America. The service is distributed through multiple resellers and offers over 450 channels and 16,000 VOD titles. TVExpress[.]com[.]br is one of the main services for purchasing subscription packages and downloading the app, which can be accessed through various devices, including Firestick, Android TV, television box, desktop, and mobile devices. The domain received 27,126 visits from 20,666 unique visitors in August 2025, according to SimilarWeb. TVExpress[.]com[.]br has been active since 2020 and is hosted by Canva PTY Ltd. Access to multiple TVExpress derived URLs are currently blocked under Brazilian Operation 404 court orders and IPs are also being blocked/disrupted through an initiative of the Brazilian telecommunications regulatory agency, ANATEL. Preliminary information is common to TVExpress[.]com[.]br and MyFamilyCinema, another prominent and growing IPTV service, which indicates that operators in China may be behind the operation of both services.

Piracy Devices and Apps

Piracy devices—also known as illicit streaming devices (ISDs)—and piracy apps provide illegal access to movie and television content through a variety of means, including downloading and streaming content and unauthorized streaming of live television and sporting events on a user's choice of devices, including televisions. ISDs that are preloaded with infringing apps and television/VOD subscription services can be found online and in physical marketplaces. Additionally, illegal apps that can place infringing material on otherwise legitimate streaming devices can be found through a myriad of mainstream and specialty app repositories representing a growing threat.

Piracy devices and apps of focus are listed below in alphabetical order.

• **EVPAD** – China. EVPAD (evpadhk[.]com) is an Android-based set-top box ecosystem that uses peer-to-peer technology and proprietary EVPAD-branded apps including Venus VOD to provide unauthorized access to a vast library of pirated

content. The devices enable streaming of more than 2,000 infringing movies and television titles and over 1,000 live international channels including premium sports and entertainment programming. EVPAD is distributed through a wide global reseller network and has built a large international user base. The service is deliberately geoblocked within Mainland China to evade local enforcement and remains highly active in multiple markets.

- LokLok, RookTV, LokTV, LokiOK China; Singapore. This piracy app and website network has grown rapidly across Southeast Asia with users mainly from the Philippines, Malaysia, and Indonesia. The operators, suspected to be based in China, deliberately geo-block the service in China to evade local enforcement. Despite repeated takedowns on Google Play Store, the operators abused Google's counternotice system to have their apps reinstated and Android versions remain widely available through third-party sources. Site-blocking measures in Indonesia and Malaysia have had only temporary effect as the operators are actively expanding through related apps such as RookTV which shares the same infrastructure. There are corporate entities in Singapore and Hong Kong that appear to support Loklok's operations. According to SimilarWeb, loklok[.]com attracted 1.5 million visits from 1.1 million unique visitors in August 2025.
- PikaShow India. According to MPA's analysis, the PikaShow application has been downloaded over 10 million times across various mobile application stores and Telegram. The application sources most of its content directly from the servers of copyright holders (live television and VOD) by circumventing their technological protection measures and reuploading and hosting the stolen content on third-party cyberlockers and user-generated content platforms. In November 2022, the Delhi High Court directed the blocking of URLs offering the Pikashow app for download. In January 2023, the Bengaluru police arrested a suspected operator of Pikashow. However, the application is still available for download on various websites, such as pikashow[.]com[.]co, pikashowhub[.]com, and pikashow[.]su. Collectively, these sites have had more than 19 million visits from January to August 2025 and more than 2 million visits in August 2025 alone, according to SimilarWeb.
- Unblock Tech (unblocktech[.]com & ub1818[.]com) China. Unblock Tech's "Ubox" series of ISDs pose enormous piracy and enforcement challenges. The manufacturer of the Unblock Box appears to be Shenzhen Unblock Global Technology Co. Ltd. Operators selling the box and providing after-sales service can be found throughout Asia and worldwide. Ubox runs on Android and incorporates peer-to-peer (P2P) technology and UB-branded apps to enable access to pirated VOD and live television channel content. Unblock Tech appears to have a user base that is global but

particularly strong among Chinese speakers in the Asia-Pacific region. The official sites (unblocktech[.]com & ub1818[.]com) currently receive around 200,000 visits per month, with Taiwan, Malaysia, the United States/Canada, and Hong Kong making up

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²⁶ Dehli HC orders blocking of streaming app 'Pikashow' over alleged copyright violation, ETLegalWorld.com (Nov. 17, 2022), https://legal.economictimes.indiatimes.com/news/industry/delhi-hc-orders-blocking-of-streaming-app-pikashow-over-alleged-copyright-violation/95573955.

over 80 percent of the traffic. An affiliated streaming website for Ubox, www.ub1818[.]com, was referred to the NCAC during its 2021 anti-piracy campaign. The NCAC transferred the case to the Shenzhen Market Supervision and Regulation Bureau which undertook a very brief investigation prior to notifying the NCAC that as the site was geoblocked and not accessible in China, resulting in no enforcement action being taken. In 2024, the New Taipei District Court indicted a Taiwanese national for working with Unblock Tech to steal and upload copyrighted content from television channels. He was sentenced to four years in prison, and the court ordered him and Unblocktech Taiwan to jointly pay TWD132.5 million in damages to affected broadcasters. In 2025, a U.S. district court ordered Unblock Tech and its distributors to pay Tencent nearly \$85 million in damages for infringing the Chinese tech giant's copyrights on video content.²⁷ Recently, the Criminal Investigation Department of the Singapore Police Force conducted a raid that led to the seizure of several Unblock Boxes and the arrest of two suspects involved in the online sale of the devices. Investigations are ongoing.

Peer-to-Peer (P2P) Networks & BitTorrent Portals

P2P networks use software that allows users to illicitly make their libraries of content available to any other user of the same network. The most popular P2P software is BitTorrent. BitTorrent websites facilitate file sharing by organizing and indexing torrent files, which allows trackers to initiate and manage the download process. BitTorrent remains popular, serving millions of torrents to tens of millions of users at any given time.

The notorious torrent sites discussed in this year's filing below were identified in part because of their high-quality, recently released content and because—in some cases—they coordinate the actual upload and download of that content.

P2P networks and BitTorrent portals of focus are listed below in alphabetical order.

- 1337x[.]to Bulgaria. 1337x[.]to is a popular torrent website that allows users to download movies, television shows, games, music, apps, and other files. Users can sort content by genre, year, and language. The site accepts Bitcoin donations to help finance its operations and hosts advertisements from the popular ad network Adcash. 1337x[.]to is amongst the highest-ranked and most visited pirate sites across European countries. In August 2025, 1337x[.]to had a global SimilarWeb rank of 743 with 40.93 million visits according to SimilarWeb data. The site is hosted by BlueAngelHost in Bulgaria, which promotes itself as a webhosting provider that ignores copyright infringement notices. Variants of the site have been subject to blocking orders in Italy, Spain, Belgium, Sweden, Portugal, Malaysia, the Netherlands, Singapore, Indonesia, India, Austria, and Australia.
- **Rutracker[.]org** Russia. This BitTorrent portal was launched in 2010 in response to the takedown of Torrent[.]ru by the Russian criminal authorities. Rutracker[.]org is

²⁷ China's Tencent Wins Video Copyright Infringement Case in U.S. District Court, Reuters (Feb. 13, 2025), https://www.reuters.com/legal/chinas-tencent-wins-video-copyright-infringment-case-us-district-court-2025-02-13/.

a BitTorrent indexing website with 15.5 million registered users and 2.6 million active torrents. It is one of the world's most visited pirate websites, with a global SimilarWeb ranking of 1,005 and a local rank of 116 in Russia. According to SimilarWeb, Rutracker[.]org had 37.48 million visits from 6.123 million unique visitors in August 2025. The site is hosted in Russia by Dreamtorrent Corp., a Seychelles company that we believe is also its owner. The site has been subject to blocking orders in Malaysia, Brazil, Indonesia, Italy, India, Denmark, Australia, Singapore, and Russia.

- ThePirateBay[.]org Global. Available in 35 languages, ThePirateBay[.]org (TPB) is one of the largest BitTorrent websites on the Internet. In August 2025, ThePirateBay[.]org had a global rank of 1,349 and a U.S. rank of 1,109, with 29.41 million visits from 7.34 million unique visitors, according to SimilarWeb. While the TPB founders were criminally convicted for large scale copyright infringement, TPB remained operational via multiple alternative domains hosted in various countries over the years. The hosting location of the website is concealed by Cloudflare's reverse proxy service and its hosting provider Shinjiru Technology of Malaysia. The Pirate Bay is currently blocked in at least 22 countries: Argentina, Australia, Austria, Belgium, Bulgaria, Denmark, Finland, France, Iceland, India, Indonesia, Ireland, Italy, Malaysia, Netherlands, Norway, Portugal, Romania, Singapore, Spain, Sweden, and the United Kingdom.
- Yggtorrent[.]top Morocco. YggTorrent is the largest Francophone BitTorrent community. In August 2025, Yggtorrent[.]top had a global rank of 3,750 and a rank of 213 in France, with 9.78 million visits from 1 million unique visitors, according to SimilarWeb. The majority of visits originated from French-speaking countries, including France (60 percent), Canada (11 percent), Belgium (8 percent), Algeria (3 percent), and Switzerland (2.45 percent). The site offers access to over 72,000 movies and 48,000 television series, affecting all ACE members. Yggtorrent has been subject to site-blocking orders in France, Belgium, and Lithuania. The suspected operators are based in Morocco. The website relies mostly on Amarutu's hosting servers in the Netherlands, and it employs multiple load balancers and different domains pointing to its content, indicative of the high traffic it generates.
- Yts[.]mx Bulgaria; Belize. The world's most popular P2P torrent site dedicated to movies, YTS boasted 66.42 million total monthly visits from 8.07 million unique visitors in August 2025, according to SimilarWeb, which ranks it 554 globally. Over 62,000 movies are available in HD and 4K quality. While the site is accessible from all over the world, it is most popular in the U.S., which originates 19.71 percent of its traffic. The site has worldwide appeal due to its vast library of quality torrents, but also the accompanying subtitle sites provides subtitles in an array of languages synchronized to each individual torrent. The site has been blocked in France, the United Kingdom, Italy, Ireland, Norway, Australia, Indonesia, Malaysia, Portugal, Denmark, India, and Spain—and frequently changes web domains to evade site blocking. It is currently hosted by 4 Vendeta EOOD (aka Tamatiya EOOD) in Bulgaria, Private Internet Hosting in Belize, and LeaseWeb Netherlands B.V. in the Netherlands.

Hosting Providers

Hosting providers offer the essential infrastructure to operate a website. In particular, websites engaged in massive copyright infringement require hosting providers that enable high-quality video playback. The hosting provider has the power to take offline websites engaged in massive copyright infringement. Some hosting providers also provide reverse proxy and CDN functionality to their customers and, thus, allow copyright infringers to thwart enforcement efforts. Given the central role of hosting providers in the online ecosystem, it is disconcerting that many refuse to take action upon notification that their services are being used to infringe intellectual property in blatant violation of both their own terms of service and the law. Some hosting providers are referred to as "bulletproof" because their terms of service even allow their customers to upload and distribute infringing content without consequence.

Hosting providers of focus are listed below in alphabetical order.

- Crypto Servers Ltd Belize. Crypto Servers Ltd is an offshore hosting provider registered in Belize, associated with the IP range 93.115.61.0/24. The company provides infrastructure commonly used by pirate sites seeking anonymity and takedown resistance. Notable infringing services relying on Crypto Servers Ltd include the Megacloud/Vidcloud/Rapidcloud PaaS network, as well as the Hianime and Myflixerz/Sflix streaming platforms. Although the company lists an abuse contact, it operates with limited transparency, offshore registration, and lack of accountability, characteristics often associated with bulletproof hosting.
- **DDos-Guard[.]net** United Kingdom; Russia. This service is considered a bulletproof hosting provider for pirate sites. Some of the biggest infringing sites are taking advantage of DDos-Guard's services, including filemoon[.]sx, animefly[.]net, and DoodStream[.]com (see section on direct download cyberlockers and streaming video hosting services above). DDos-Guard does not respond to takedown requests.
- Private Layer, Swiss Global, Netulu, and affiliated companies Panama; Switzerland. For years, Private Layer, Swiss Global, and affiliated companies have served as trusted partners for infringing sites. Private Layer and Swiss Global operate in anonymity, refusing to respond to outreach notices. They host an array of infringing sites. The company is registered in Panama and uses servers located in Switzerland.
- Squitter, ABC Consultancy, Peenq, ESTOXY, BestDC, SERDECH Netherlands; Estonia. Squitter is a fast-growing hosting provider for infringing sites. As other hosting providers remove infringing content, Squitter is the replacement destination of choice for many pirates. The service changes names regularly, making it more difficult to track and identify. Currently, SERDECH and BestDC are the names it uses most frequently. Its 30 servers are in the Netherlands. The companies are registered in different countries including the Netherlands and Estonia.
- Veesp Latvia. Veesp is also recognized as a hosting provider that offers strong support
 to pirate websites by hosting front-end domains that backend servers without complying
 with rightsholders' notices of copyright infringement. Many pirate sites have used, or are

still using, Veesp to host and serve media content, including limetorrents[.]lol, 1337x[.]to, 123moviesfree[.]net, and pelisplusgo[.]vip.

• Virtual Systems, V-Sys – Ukraine. Virtual Systems has been a go-to hosting provider for infringing sites for many years. Over the years, it has hosted content from VOD streaming websites, IPTV services, and sports live streaming websites including just2watch[.]com, 123moviesfree[.]at, rojadirectaa[.]com, diziwatch[.]tv, and StreamHD. The StreamHD piracy brand hosts an extensive catalog of live piracy events and streams for large quantities of sports events. The sites allow other linking sites to embed their videos, and they frequently change domains to avoid enforcement. Examples of past and current domains include advxmedia[.].xyz, advsmedia[.]xyz, cdn[.]stream-24[.]xyz, cdn[.]iptvs[.]click, and cdn[.]iptvs[.]pw. The company is registered in Ukraine, where the servers are hosted.

Registries

Registries are organizations that oversee the registration and maintain the authoritative database of domain names within a specific top-level domain (TLD). Registries operate either generic TLDs (gTLDs) such as .com or .org or country code TLDs (ccTLDs, such as .fr for France or .us for the United States). Registries usually delegate the function of registering domain names to registrars, which operate under their supervision. A registry—directly or via its contractual relationship with its registrars—can withdraw or disable domain names used by websites engaged in massive copyright infringement.

The following registries continue to maintain domain registrations for notorious piracy sites despite repeated notification and outreach. These registries are listed in alphabetical order.

- .cc Registry .cc is the ccTLD for the Cocos (Keeling) Islands, an Australian territory. Examples of infringing website operating with the .cc domain are autoembed[.]cc, movielair[.]cc, moviemaze[.]cc, streamtape[.]cc, and vidsrc[.]cc.
- .io Registry .io is the ccTLD for the British Indian Ocean Territory. This registry is operated commercially by Afilias, a subsidiary of Ethos Capital. Examples of infringing websites operating with .io domains include hydarhd[.]io, vidfast[.]io, and vidsrc[.]io.
- .ru Registry .ru is the ccTLD for the Russian Federation, and its registry is the Coordination Center for TLD RU. Examples of infringing websites operating with .ru domains include 1shows[.]ru, lordfilm12[.]ru, rlsbb[.]ru, seasonvar[.]ru, and livetv[.]ru.
- .su Registry .su is the ccTLD for the former Soviet Union and still in use today. The registry is operated by the Russian registry RU Center. Examples of infringing websites operating with .su domains include livesport[.]su, stream[.]su, streamed[.]su, and uzor[.]su.
- .sx Registry .sx is the ccTLD for Sint Maarten, and its registry is managed by SX Registry SA B.V. Examples of infringing websites operating with. sx domains include livetv[.]sx and filemoon[.]sx.

- .to Registry .to is the ccTLD of Tonga, and its registry is the Tonga Network Information Center. Examples of infringing websites operating with .to domains include goojara[.]to, hianime[.]to, hdtodayz[.]to, 1337x[.]to, vixsrc[.]to, and bs[.]to.
- .tv Registry .tv is the ccTLD for Tuvalu. Examples of infringing websites using .tv domains include hdtodaytv[.]tv, mykadri[.]tv, and loklok[.]tv.

Closing

In the U.S. and around the world, the motion picture and television industry is a community of creators and innovators who work tirelessly at the art and craft of storytelling. The criminals who profit from the most notorious markets threaten the very heart of our industry and in so doing, threaten the livelihoods of the people who give it life. These markets are an immediate threat to legitimate commerce, impairing legitimate markets' viability and curbing U.S. competitiveness. USTR's efforts to shine a light on the most egregious instances of copyright theft in foreign markets is an essential step in fostering creativity and innovation—not only in the film and television industry—but throughout the creative economy.

MPA appreciates the opportunity to comment and is ready to provide further information or answer questions as requested.

Sincerely,

Charles H. Rivkin Chairman & CEO