



MOTION PICTURE ASSOCIATION

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October 2, 2024

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

Re: Request for public comment  
on the 2024 Special 301 Out-of-  
Cycle Review of Notorious  
Markets Docket No. USTR-2024-  
0013

Dear Mr. Lee:

The Motion Picture Association (MPA) submits the following response to the request issued August 16, 2024, by the Office of the U.S. Trade Representative (USTR), inviting submissions from the public on notorious markets outside of the United States.

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. Our member studios are: Netflix Studios, LLC; Paramount Pictures Corporation; Prime Video & Amazon MGM Studios; Sony Pictures Entertainment Inc.; Universal City Studios LLC; Walt Disney Studios Motion Pictures; and Warner Bros. Discovery.

MPA also leads the Alliance for Creativity and Entertainment (ACE),<sup>1</sup> 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.

The American motion picture and television industry is a major U.S. employer that supported 2.74 million jobs and \$242 billion in total wages in 2022. This includes 376,000 jobs in the core

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<sup>1</sup> For more information, please visit [www.alliance4creativity.com](http://www.alliance4creativity.com).



business of producing, marketing, and manufacturing motion pictures, television shows, and video content, as well as 550,000 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 2022, the enduring value and global appeal of U.S. entertainment earned \$17 billion in audiovisual exports. Today, there are over 1,000 legitimate streaming services 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 2022, that services trade surplus was \$10.3 billion, or 3 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 well 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.

While in prior years MPA had included physical marketplaces in our notorious markets recommendations to USTR, this year we again focus 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.

### Overview

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.

We are pleased to provide information in this response showcasing how such collaborative efforts



can detect and stop offenders. For example, as we highlight below, in the past year multi-stakeholder efforts have led to the takedown of notorious offenders in countries around the world, including the shutdown of Fmovies, a massive Vietnamese streaming piracy service.

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[.]im, cuevana[.]biz, and The Pirate Bay, whose current domain, thepiratebay[.]org, has been identified as infringing rights holders' copyrights more than six million separate times.<sup>2</sup> Another example of a CDN and reverse proxy service frequently used by notorious markets to avoid detection and enforcement is DDos-Guard. 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. 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 illegal Internet protocol television (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 unsuccessfully trying to register its trademark 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.<sup>3</sup> 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. The emergence and development of PaaS providers have become key concerns for

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<sup>2</sup> 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?hl=en>.

<sup>3</sup> 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").



MPA and ACE are a top priority for our anti-piracy efforts.

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 the Federal Register Notice (FRN), including popularity rankings and site traffic volume data from SimilarWeb,<sup>4</sup> 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 in 2024. Particularly, key developments came out of Vietnam, one of the leading global exporters of piracy services today. In August 2024, the Vietnamese Ministry of Public Security, supported by ACE, HSI, and the USDOJ shut down the largest pirate streaming operation in the world.<sup>5</sup> The illegal piracy operation comprised Fmovies and numerous other notorious streaming piracy sites

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<sup>4</sup> 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.

<sup>5</sup> TorrentFreak, *Fmovies Piracy Ring Was Shut Down By Vietnam Assisted by ACE* (Aug. 29, 2024), <https://torrentfreak.com/fmovies-piracy-ring-was-shut-down-by-vietnam-assisted-by-ace-240829/>.



such as bflixz, flixtorz, movies7, myflixer, and aniwave, to name a few. Domains controlled by this syndicate drew more than 6.7 billion visits between January 2023 and June 2024. Vidsrc[.]to, a notorious video hosting provider operated by the same individuals was also taken down, impacting hundreds of additional dedicated piracy sites. While the takedown of the sites is a positive development, copycat services regularly attempt to exploit takedowns of large piracy brands. As such it is important that the pending case against the Fmovies operators moves through the criminal process without delay, and that a suitably deterrent sentence—that reflects the unprecedented scale of the criminal activity involved—is imposed on all operators.

In another notable development, Vietnamese Courts handed down their first criminal convictions for copyright offenses since the Penal Code was amended in 2015 to include them. These included convictions by the Hanoi People’s Court of the “BestBuyIPTV” pirate service, and the conviction by the Quang Binh Province People’s Court of the “bilutvt[.]net,” “tvhayh[.]org,” and “animefull[.]net” services.<sup>6</sup> While the first criminal conviction was undoubtedly a positive development, both convictions resulted in suspended sentences against the operators. MPA encourages the Vietnamese Government to reevaluate the penalties to ensure they are commensurate with the significant damage and harm caused to the digital ecosystem and global economy.

In India, MPA lauds the Delhi High Court for the decision in *Universal City Studios LLC & Ors vs. dotmovies.baby & Ors.*,<sup>7</sup> which broke new ground by applying blocking orders to domain name registrars of rogue websites, requiring them to “lock and suspend” said domain names, and provide to the Plaintiffs “any details relating to the registrants of the said domain names including Know Your Customer, credit card, mobile number, etc.” In one wave in 2024, this led to domain suspensions of 1.2 billion piracy visits annualized to sites (suspended) like zero, moviesmod, flixwave, and upmovies.

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***

- **Vegamovies** – India. Vegamovies is one of the most popular piracy streaming sites in India with at least 40 known associated domains. Vegamovies domains hop and proliferate such that traffic is dispersed and in August 2024, vegamovies[.]nu was ranked #115 in India and #1,083 globally, with that domain responsible for 39.93 million visits from 6.77 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<sup>8</sup> such as FilePress and

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<sup>6</sup> See, e.g., TorrentFreak, ‘BestBuyIPTV’ Operator Sentenced in Vietnam’s First Ever Online Piracy Conviction (April 22, 2024), <https://torrentfreak.com/bestbuyiptv-operator-sentenced-in-vietnams-first-ever-piracy-conviction-240422/>.

<sup>7</sup> *Universal City Studios LLC & Ors vs. dotmovies.baby & Ors.*, CS(COMM) 514 of 2023.

<sup>8</sup> 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



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 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.

- **Cuevana[.]biz/[.]eu** – Venezuela. After the takedown of the original Cuevana-branded site, the Cuevana[.]biz/Cuevana3[.]eu 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, respectively. Cuevana[.]biz received 108.3 million visits from 22.86 million monthly unique visitors, with a global rank of 521 and local ranks of 61 in Mexico, 40 in Colombia, 50 in Argentina, and 45 in Peru in August 2024, 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.
- **Animeflv[.]net** – Peru. 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 1.46 billion visits from July 2023 to July 2024 and is ranked 455 globally. In August 2024, the site received 96.42 million visits from 7.51 million visitors with local ranks of 49 in Mexico, 106 in Spain, 63 in Colombia, 60 in Chile, and 113 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.

#### *Additional Notorious Linking and Streaming Sites*

- **Bs[.]to** – Germany. Bs[.]to is one of the most popular German illegal streaming websites offering exclusive television series. According to SimilarWeb, the website is ranked 6,191 globally and 367 in Germany. In August 2024, the website had 12.44 million monthly visits from 1 million unique visitors according to SimilarWeb. Most of the traffic originates from German-speaking countries with Germany (55.25 percent), Switzerland (14.76 percent), and Austria (10.12 percent) providing more than 80 percent of global traffic. The website offers 9,331 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.
- **Buffstreams[.]app** – France. Buffstreams[.]app is an English-language live sports piracy site that provides free live streaming of various sports events, covering popular sports such as NBA, NFL, 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

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revealed. The way to obtain the file is via the Cloning Tool's domain. After granting the permission, the file is copied directly into the end user's drive account.



received 4.39 million visits from 1.62 million unique visitors in August 2024 and received 58 percent of its traffic from the United States, according to SimilarWeb. The site is hosted by Virtual Systems LLC located in the Ukraine, and its operators are believed to be in France.

- **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 21.61 million worldwide visits from 4.58 million unique visitors in August 2024, according to SimilarWeb. The site currently has a global SimilarWeb rank of 2,971 and a local rank of 63 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.
- **Diziwatch[.]net** – Turkey. Diziwatch[.]net is Turkey’s most popular illicit streaming services that focuses on television series, but also offers movies via its connected site filmmax[.]org. According to SimilarWeb, the main domain Diziwatch[.]net holds a global ranking of 2,981 and attracted 27.4 million global monthly visits from 2.29 million unique visitors in August 2024. Diziwatch[.]net offers a wide variety of content, over 35,200 television series episodes, including western television series and anime. The site is hosted in the Netherlands at SpectralIP B.V. and is believed to be operated from Turkey.
- **Dramasq[.]com** – Taiwan. Dramasq[.]com is a Chinese language-based streaming website popular in Taiwan. In April of this year, the site removed almost all of its English-language content after redirecting to sites like duonh[.]com, mixixibihe[.]com, but still competes with legitimate streaming services that produce and distribute content by providing Korean, Chinese, Japanese, Thai, Hong Kong, and Taiwan series and films. The site received 13.27 million visits from 1.23 million unique visitors with a local rank of 103 in Taiwan in August 2024, according to SimilarWeb.
- **Dytt8[.]net, dytt89[.]com, dy2018[.]net, dy2018[.]com, dydytt[.]net, and ygdy8[.]com** – China; Taiwan. In August 2024, dytt8[.]net, which was ranked 25,301 globally and 767 in China, received on average 2.34 million monthly visits according to SimilarWeb data. 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. Dytt8[.]net is part of a group of related sites including dytt89[.]com, dy2018[.]com, dy2018[.]net, dydytt[.]net, and ygdy8[.]com. The sites were referred to the National Copyright Administration of China (NCAC) in 2019 and 2022 as part of its annual “Swordnet” campaign, but no action was taken. Dytt8[.]net is blocked in Australia and Malaysia and dy2018[.]com is blocked in Malaysia.
- **Gimy[.]jai** – Taiwan/China. A criminal referral for the highly popular Chinese language Gimy pirate website was made in Taiwan in December 2020, following a raid of the operators’ office in early 2021 when four Taiwanese operators were charged and convicted in 2023. Despite this, the site has reemerged with many mirror sites and alternative domains including redirections and mirrors to Gimy[.]jai (the current main domain), Gimy[.]video, Gimy[.]is, Gimy[.]im, Gimy[.]cc, and Gimy[.]tube, among other domains used by the pirate operators to evade blocking orders. Gimy’s global



SimilarWeb rank is 1,234 and the site is extremely popular in Taiwan with a local rank of 20. The Gimy website/domains had an aggregate of 49.06 million monthly visits in August 2024 from over 5.96 million unique visitors, according to SimilarWeb.

- **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; and goojara[.]ch (which redirects to goojara[.]to), wootly[.]ch, and nebula[.]to. Goojara[.]to is ranked 1,654 globally and 28 in South Africa, according to SimilarWeb data of August 2024 with more than 31 million monthly visits. Goojara[.]to is blocked in Indonesia, Malaysia, India, and Australia. Levidia[.]ch is blocked in Malaysia, United Kingdom (UK), Australia, and Italy.
- **Hianime[.]to** – Vietnam. Hianime, formerly known as Zoro[.]to and Aniwatoh[.]to, has a global ranking of 194 with 209.5 million visits from 23.36 million unique visitors in August 2024, 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.
- **Indoxxi Network** – Indonesia. Indoxxi is a popular brand of Indonesian streaming sites that provide unauthorized access to a vast selection of movies and television series. Given that current Indoxxi domains are static IP addresses (nameless domains), the popularity of Indoxxi sites is hard to track. Since 2018, there has been a continuous effort by the Indonesian government to disrupt and block Indoxxi domains. In December 2019, following the blocking of hundreds of Indoxxi domains, the operators publicly announced that they would cease operating as of January 1, 2020. However, Indoxxi continued its operations via nameless domains and fixed IP addresses routed through reverse proxies to circumvent blocking orders. Indoxxi sites are well known for gambling advertisements and forensic evidence suggests that a high percentage of the gambling advertisements are placed by the site operators themselves and not via an advertising exchange, indicating that Indoxxi sites are also being used to attract users to gambling websites that Indoxxi controls. Indoxxi applications can be found on multiple websites and Android APK platforms. The network also operates Telegram groups that provide links to infringing content and announce changes to a website’s fixed IP addresses. The Indoxxi network is operated in Indonesia.
- **Librefutbol[.]su** – Latin America. Librefutbol[.]su is a widely popular illegal live sports streaming site. With a focus on Latin American soccer, especially those leagues popular in both Argentina and Chile, it also offers access to several other live sports streams like the MLB and the NFL. received 53.91 million visits from 13.15 million unique visitors in August 2024, according to SimilarWeb. The site ranks 1,117 globally as well as 32 in Venezuela, 49 in Chile, and 55 in Colombia in August 2024, according to SimilarWeb. The hosting location is masked by the use of Cloudflare’s reverse proxy service.
- **Librefutboltv[.]net** – Argentina. Librefutboltv[.]net attracted 38.67 million visits from 8.15 million monthly unique visitors in July 2024, according to SimilarWeb. It is one of the largest illegal live sports streaming services in Latin America. Librefutboltv[.]com ranks globally as 1,123 and has a local rank of 28 in Argentina, 416 in Colombia, and 542 in Mexico, according to SimilarWeb. The site’s operators monetize through





advertising served by many national and international ad networks. The hosting location is masked using Cloudflare's reverse proxy service.

- **Rezka[.]ag** – Ukraine. Formerly known as hdrezk[.]me, rezka[.]ag is a popular Russian language streaming website that offers over 49,000 movies and 14,500 television series, including cartoons and anime. According to SimilarWeb, Rezka received 65.1 million visits from 10.2 million unique visitors in August 2024 despite site blocking orders in multiple jurisdictions including Ukraine, Russia, Indonesia, Spain, and Brazil. Rezka also provides a CDN service that is used by other piracy sites.
- **s[.]to** – Germany. s[.]to is a German streaming website offering only television series. The website is currently ranked 6,271 globally and 396 in Germany, it attracted 12.46 million visits from 915,281 unique visitors in August 2024, according to SimilarWeb. The website offers episodes for 9,386 television series. The hosting location is masked using DDoS Guard's reverse proxy service.
- **Soaper[.]tv** – China. Soaper[.]tv is an English-language streaming site that offers thousands of film and television titles for streaming and direct download. The site received 11.12 million visits from 1.35 million visitors in August 2024 and is popular in the United States as well as in other English-speaking territories like Canada, the United Kingdom, and Australia according to SimilarWeb. While the site uses the Malaysia-based hosting provider Shinjuru Technology Sdn Bhd, its operators are believed to be in China.
- **Solarmovie[.]to** – Vietnam. In August 2024, Solarmovie[.]to received 10.82 million monthly visits from 3.18 million unique visitors according to SimilarWeb. This is an English-language website which enables users to stream movies and television series online for free. This site has been subject to blocking orders in Italy, the UK, India, Norway, Malaysia, Indonesia, Australia, and Denmark. The suspected operator is based in Vietnam.
- **Tamilblasters** – India. Tamilblasters is an India-based, English-language streaming/torrent website popular in India. Apart from providing torrent and magnet links on their main site (currently at 1tamilmv[.]eu), users can also stream content directly through their sites. To avoid blocking orders, it hops across multiple domains (.eu, .pm, .tel, .sbs, .info, .info, .fans, .art, and .shop). 1tamilmv[.]eu received 6.38 million visitors from 1.25 million unique visitors in August 2024 and is currently ranked 19,656 globally and 2,127 in India, according to SimilarWeb.
- **TV\*\*[.]wiki (e.g., tv51[.]wiki)** – Korea. The site provides access to a range of content, including movies and television series. This series of domains utilizes “sequential domain aliasing” to evade detection by enforcement vendors, traffic measurement bots, and evade site-blocking efforts. The current sequential domain as of September 19, 2024, tv51[.]wiki, received 39.49 million visits from 2.87 million visitors in August 2024, according to SimilarWeb. The operators are believed to be based in Korea.
- **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 transitioned to veronline[.]in August 2024. Veronline[.]in had



27.1 million visits from 2.66 million unique visitors in August 2024, according to SimilarWeb. The service is dedicated to streaming television shows with significant traffic from Spain (12.28 percent), Mexico (22.86 percent), and Argentina (21.60 percent), among others. The website’s operators monetize it through advertising provided by various national and international ad networks. Hosted by Namecheap, Inc., Veronline[.]in uses Cloudflare’s services to mask its IP location.

### **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) 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 22 and 23); (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 break up the content and host it across dozens of random links to inhibit its takedown, without inhibiting its access via a streaming site that pieces the content back together); (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.<sup>9</sup> PaaS is evidence of the scale, sophistication, and profitability of modern online commercial copyright infringement.

An important 2024 development in this space was the takedown of the PaaS provider VidSrc[.]to based out of Vietnam. This original VidSrc service had been used by at least 545 popular piracy streaming sites. The combined traffic of all streaming sites using the original VidSrc totaled more than 1.4 billion visits in July 2024 according to SimilarWeb. VidSrc and associated sites were successfully taken down following action taken by the Vietnamese Ministry of Public Security, supported by ACE in Q3 2024 though a copycat successor has since emerged.

MPA lists Notorious PaaS providers of focus in alphabetical order.

- **2embed** – Vietnam. This is a pirate CMS which offers a large library of movies via streaming, direct link, or embedding. Pirate site operators can either use 2embed’s service for free, in which case 2embed remunerates itself by inserting ads, or use its paid service that allows them to insert their own ads. Although the 2embed[.]to domain was successfully taken down by ACE in June 2023, ACE is aware of a number of successors

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<sup>9</sup> Europol Threat Assessment.



which continue to operate through alternative domains with combined monthly visitors eclipsing 600 million in July 2024 according to SimilarWeb. The operators of 2embed are located in Vietnam.

- **Fire Video Player** – Turkey. 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 was developed and is operated from Turkey and has at least 78 sites using the service directly, totaling over 125 million visits in July 2024 according to SimilarWeb including popular sites such as fmovieanimehay[.]bio and desicinemas[.]tv.
- **HDVB** – Russia. HDVB has been detected on 183 sites with combined traffic over 500 million in July 2024 according to SimilarWeb data providing English- and Russian-language content delivery solutions; it is a video player that can be embedded directly onto piracy websites. HDVB is free to use and monetizes its videos through serving ads to viewers directly in the player, paying its users roughly \$0.40 per 1,000 views. It has no front-facing website and communication with the PaaS can be done through various forum threads, email, or on Telegram. The suspected operators of HDVB are in Russia.
- **Njal[.]la or 1337 Services** – Nevis. 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. 1137 LLC, the company behind Njal[.]la, is based in Nevis. Njalla is prominent among pirate services, with customers such as FlixTor[.]se and ygg[.]re.
- **Rewall[.]in** – Russia. Formerly collaps[.]org, Rewall[.]in is a pirate video CDN which gained attention since Moonwalk was taken down in 2019. This network lost popularity beginning of 2021 due to Roskomnadzor blocking it in Russia but it is still actively used by dozens of infringing websites. This off-the-shelf piracy facilitation service makes it easy for would-be pirates to create and monetize a fully functioning pirate service.
- **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 (doods[.]pro)** – India. Doodstream with at least 40 known associated websites (e.g., doodstream[.]com, 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 could then be disseminated through Web links on illegal streaming websites and other platforms. The service 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 2023. In August 2024, doods[.]pro, which was ranked 10,315 globally and 361 in Indonesia, received 4.15 million monthly visits from 2.57 million unique visitors, according to SimilarWeb data. In March 2024, a group of Plaintiffs including MPA members filed a lawsuit against Doodstream in the Delhi High Court.<sup>10</sup> In May 2024, the Court granted an interim injunction against the operators of Doodstream, though the domains are still active, and the Defendants have failed to comply with the court’s orders. Various Doodstream domains have been blocked in France.
- **Telegram** – UAE. Telegram is an instant messaging service available on Windows, iOS, Android, and Linux and allows 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.<sup>11</sup> Telegram 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.<sup>12</sup>

<sup>10</sup> See, e.g., TorrentFreak, *Court Bans DoodStream’s Owners & Associates From Running the Site* (June 8, 2024), <https://torrentfreak.com/court-bans-doodstreams-owners-associates-from-running-the-site-240608/>.

<sup>11</sup> Hannah Murphy, *Telegram hits 900mn users and nears profitability as founder considers IPO*, Financial Times (March 11, 2024), <https://www.ft.com/content/8d6ceb0d-4cdb-4165-bdfa-4b95b3e07b2a>.

<sup>12</sup> TorrentFreak, *Piracy Bots Chansels Are Rampant on Telegram But For How Long?* (May 19, 2023), <https://torrentfreak.com/piracy-bots-and-channels-are-rampant-of-telegram-but-for-how-long-230519/> (“Initially, Telegram did not



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 and 2022, the European Commission placed Telegram on its *Counterfeit and Piracy Watch List*.<sup>13</sup> Enforcement actions have been brought successfully in India, Israel, and Italy requiring Telegram to provide operator information and block access to infringing content.<sup>14</sup> Telegram is a platform of immediate concern.

- **Mixdrop[.]co** – United Kingdom. This video hosting service has an affiliate program, MixPartners, and claims that affiliates may earn up to \$1,000 a week depending on the number of views they generate. Mixdrop has a network of different domains to operate its service. The main domain is mixdrop[.]ag, which attracted 2.82 million visits from 1.29 million unique visitors while Mixdrop[.]ps, another network domain that redirects to mixdrop[.]ag, attracted 21.17 million visits from 8.17 million unique visitors in August 2024, according to SimilarWeb. The streaming content served by Mixdrop is sourced from different subdomains of the mxcontent[.]net domain, which in August 2024 generated 3.89 million visits from 1.69 million unique visitors according to SimilarWeb. Mixdrop was subject to a site-blocking order in the UK in 2022, followed by site-blocking orders in Australian and Indian courts. These orders held that the operators of the Mixdrop cyberlocker facilitate massive amounts of copyright infringement and that this illegal cyberlocker is suitable for blocking due to the evidence

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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% 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 ...”).

<sup>13</sup> See, e.g., European Commission, Commission Staff Working Document, *Counterfeit and Piracy Watch List 2022*, p.12, <https://circabc.europa.eu/ui/group/d0803128-7d62-40ee-8349-c43ce92745aa/library/b36f701d-2850-4768-9b3e-e487140e11e5/details?download=true>.

<sup>14</sup> See, e.g., Times of India, *What is Telegram App and is it staring at a ban in India* (Aug. 27, 2024), [http://timesofindia.indiatimes.com/articleshow/112836540.cms?utm\\_source=contentofinterest&utm\\_medium=text&utm\\_campaign=cppst](http://timesofindia.indiatimes.com/articleshow/112836540.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst).



of piracy on the service.<sup>15</sup> Mixdrop is hosted by Amarutu Technology Ltd. and the operators are believed to be in the United Kingdom.

- **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 28.34 million visits from 10.66 million unique visitors in August 2024, 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.

### ***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 right holders, procedures for filing complaints are applied unevenly and lack transparency. Additionally, takedown times are reportedly lengthy, and right holders often have to repeatedly follow-up with Baidu to ensure that pirated content does not reappear on the platform. In August 2024, pan.baidu[.]com received 104.6 million monthly visits according to SimilarWeb data. 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 appeal decision in 2024 disappointingly reduced the level of damages awarded, although it codifies potential liability if Baidu Wangpan is notified of infringement and refuses “stay down” of the content. Baidu Pan was not required to entirely remove the infringing content from its server.
- **Netu/HQQ/WaaW** – Belize. Netu[.]io is a video hosting service heavily used for disseminating copyright protected content. Netu[.]io also relies on the domains hqq[.]to and waaw[.]to. Netu offers a reward scheme for uploaders of popular content with the highest tier offering 80 NetuCoin (\$80 USD) per 10,000 views. The domain waaw[.]to is used to access the streaming page itself through direct URL or in an iframe HTML code while the domain hqq[.]to is to be used in an iframe HTML code by a linking site. Netu allows its users to customize the streaming domain by adding a CNAME record, a custom domain obfuscating the actual IP address the content is hosted, to bypass ISPs/government blocking measures and to customize the player to create their own visual branding. The player itself also features a search function. Netu[.]ac, hqq[.]to, and waaw[.]to are currently blocked in France.
- **Rapidgator (rapidgator[.]net)** – Russia. Rapidgator, launched in October 2011, is a

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<sup>15</sup> See *Universal City Studios LLC & Ors. v. Mixdrop.co & Ors.* CS (Comm), No. 663 of 2022 (India); *Roadshow Films Pty Ltd & Ors v Telstra Corp Ltd & Ors*, NSD257/2022 (Australia).



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 Ddos Protection Ltd in Russia, its operators are obscured behind offshore companies. With a global SimilarWeb ranking of 1,513 and 27.86 million visits from 5.88 million unique visitors in August 2024, Rapidgator generates revenue from premium accounts, advertising, pop-up ads, and possibly malicious pay-per-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 over 48 million URLs have been delisted by Google, highlighting the scale of infringement. In 2018 and 2019, German courts found Rapidgator liable for copyright infringement, and a 2019 Russian court ordered ISPs to block access. 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 2024, VK[.]com which was ranked 23 globally and 4 in Russia received 1.16 billion monthly visits according to SimilarWeb data. While VK was previously responsive to takedown notices, they now ignore most of them and 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. 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 corporate-owned 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 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.<sup>16</sup> 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.<sup>17</sup> 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 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.

As mentioned earlier in this document, a positive development in the illegal IPTV services ecosystem in 2024 was the conviction of the operator of BestBuyIPTV in Vietnam. The operators of BestBuyIPTV claimed to have over 900,000 customers and offered subscriptions to the illegal IPTV service at US \$10 monthly. BestBuyIPTV was named in USTR's Notorious Markets List for the past five years, with nearly 25 percent of its traffic coming from the U.S. In April 2024, the Hanoi People's Court convicted the operator and sentenced him to 30 months' imprisonment (suspended) and issued a fine \$4,000 for copyright infringement, confiscating over \$24,000 in illegal profits. This marks the first successful criminal prosecution for a copyright offense in the jurisdiction.<sup>18</sup> Although the conviction was a positive development and should be lauded, the sentences handed down were non-deterrent, and the illegal profits confiscated were likely a mere fraction of the actual profits obtained by the operator, given his claims regarding the size of the customer base.

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.

### ***Priority Notorious Illegal IPTV Services***

- **MagisTV** – 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[.]net being one of the main services for purchasing subscription packages and downloading the app. The domain received 732,631 visits in August 2024, according to SimilarWeb. Magistv[.]net has been active since 2021 and is hosted by Google Cloud Platform, using Cloudflare's services to mask its IP location. In Latin America, there are active criminal cases against MagisTV in Ecuador (Oficialmagistv[.]com and Magistv[.]digital), Colombia (Magistv[.]la, Magisla[.]com, Magistvoficial[.]com), and Venezuela (Magistv-venezuela[.]com). Its unsuccessful efforts to register its trademark in countries like

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<sup>16</sup> Panel hosting is the ability to buy the backend of the IPTV service and customize the design of the frontend.

<sup>17</sup> Digital Citizens Alliance and NAGRA, *Money for Nothing: The Billion-Dollar Pirate Subscription IPTV Business* (Aug. 2020), p. 2, <https://www.digitalcitizensalliance.org/clientuploads/directory/Reports/DCA-Money-for-Nothing-Report.pdf>.

<sup>18</sup> See, e.g., PRNewswire, *Premiere League and ACE Commend Vietnam Authorities for Landmark Conviction in Online Piracy Case* (April 24, 2024), <https://www.taiwannews.com.tw/news/5671003>.





Ecuador has been recently highlighted.<sup>19</sup>

- **Gogo IPTV** – Algeria. Operating since 2017, Gogo/Orca is a provider of IPTV subscriptions, preloaded STB with infringing card sharing (“CCCam”) and IPTV apps. The IPTV service is popular in Europe and Algeria with 67,000 visits in July 2024, with substantial online traffic from the UK (42.85 percent), Algeria (26.69 percent), France (9.94 percent), and Germany (6.65 percent). 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.

### *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 448,207 visits in August 2024, according to SimilarWeb. The Apollo Group TV service is hosted by BL Networks in the U.S.
- **Crystal OTT** – Morocco. Crystal OTT is an extremely popular IPTV service, primarily distributed through resellers, and has one of the most extensive infringing libraries ever seen in an IPTV service, consisting of approximately 46,000 movie titles, 198,110 TV shows with full seasons and episodes, and 17,380 live television channels affecting many IP rightsholders. According to SimilarWeb, the service has attracted monthly traffic of 280,904 visits to the reseller panels and the content servers combined in August 2024.
- **GenIPTV** – Switzerland; North Macedonia. One of the largest IPTV providers in the world, GenIPTV has over 10,000 international channels and 52,000 VOD titles. The promotional websites of the service accumulated approximately 41,500 visits and 16,800 unique visitors in July 2024 according to SimilarWeb, which is highly underestimated given the multiple resellers that the service has. Hosting of their front-end domain (genip[.]tv) is with Bandwidth Technologies in the UK, and back-end 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.

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<sup>19</sup> See, e.g., TorrentFreak, ‘MagisTV’ Piracy Blocking Efforts in Ecuador Expand, Trademark Application Denied (Aug. 12, 2024), <https://torrentfreak.com/magistv-piracy-blocking-efforts-in-ecuador-expand-trademark-application-denied-240812/>.



- **Theking365tv[.]site** – Algeria. This is a long-standing and well-known IPTV provider. There are over 2,200 International channels and an extensive VOD library. According to SimilarWeb data, traffic to the website in August 2024 stood at around 52,434 visits per month from over 15,047 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 in Algeria.
- **TVExpress[.]pro** – Brazil; China. TVExpress is one of the largest IPTV brands in Latin America, though nearly 10 percent of the traffic to this website comes from European IP addresses. The service is distributed through multiple resellers and offers over 450 channels and 16,000 VOD titles. TVExpress[.]pro 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, TV box, desktop, and mobile devices. The domain received 222,249 visits from 128,842 unique visitors in August 2024, according to SimilarWeb. TVExpress[.]pro has been active since 2020 and is hosted by GoDaddy. 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's – ANATEL. Preliminary information is common to TVExpress[.]pro and MyFamilyCinema, which indicates that China may be the country 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 in alphabetical order.

- **EVPAD** – China. EVPAD (ievpad[.]com) is an Android-based set-top box that incorporates peer-to-peer technology and EVPAD-branded apps to enable access to more than 2,000 infringing movies and television titles and over 1,000 live international channels. EVPAD has a large pool of resellers worldwide and a global user base. It has recently established a new brand of set-top boxes, “EVBOX,” targeting Taiwanese & European customers. Current information suggests that the boxes are manufactured in China and that the operator is in China. However, the boxes are non-functional within Mainland China, in an apparent bid to evade enforcement action.



- **LokLok** – China; Indonesia; Singapore. This app/website has grown significantly in popularity in Southeast Asia in recent years, and particularly in the Philippines, Malaysia, and Indonesia. It appears the app/site was developed in China by local operators who evaded local detection and enforcement action by geo-blocking access to China-based IP addresses. According to SimilarWeb, loklok[.]com and loklok[.]tv attracted 1.6 million and 112,808 monthly visits from 875,914 and 25,139 unique visitors respectively in August 2024. Even though it has been taken down repeatedly in the Google Play Store, new app listings have quickly reappeared. LokLok has been disrupted by site blocking orders in Indonesia and Malaysia.
- **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 the content directly from the servers of copyright holders (live television and VOD) by circumventing their technological protection measures and then reuploads and hosts 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 the suspected operator of Pikashow. However, the application is still available for download on various websites, such as pikashow[.]com[.]co, pikashowapp[.]org, pikashows[.]download, pikashowhub[.]com, pikashow[.]su and pikashow[.]com[.]co. Collectively, these sites have had more than 16 million visits from January to August 2024, according to SimilarWeb.
- **TVMOB** – Pakistan. This service offers a free Android streaming application with access to over 500 live channels across several categories including movies and sports. According to SimilarWeb, the app saw over 1 million visits in 2024 at several domains including tvtap-pro[.]net, tvtap[.]site, and tvtap-apk[.]com, which facilitates access to the infringing application. The app is monetized through advertising placed within its content offerings. The operators are believed to be in Pakistan.
- **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 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 geo-blocked and not accessible in China, resulting in no enforcement action being taken.



## 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.

MPA congratulates the Intellectual Property Office of the Philippines (IPOP HL) for issuing its first-ever site-blocking order against one of the world’s biggest piracy sites, YTS[.]mx. We look forward to working closely and collaboratively with the IPOP HL to identify site-blocking targets and further refine its site-blocking process. While the administrative site-blocking regime in the Philippines is the first-ever voluntary site-blocking process in Asia, and the second in the world, MPA encourages the Philippine government to promptly enact long-overdue site-blocking legislation following over 40 countries around the world that have already done so.

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 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 RevenueHits, based in Israel. 1337x[.]to is amongst the highest-ranked and most visited pirate sites across European countries. In August 2024, 1337x[.]to had a global SimilarWeb rank of 917 with 39.08 million visits according to SimilarWeb data. The site is hosted by BlueAngelHost in Bulgaria, which promotes itself as a Web hosting 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.
- **DonTorrent[.]com** – Spain. DonTorrent[.]com is one of the most popular torrent services in Spain and globally. To circumvent site-blocking orders, the service changes its domain on a frequent basis, announcing the new domains on its Telegram channel. DonTorrent[.]com offers an infringing library comprising nearly 10,000 television shows with full seasons and episodes and over 25,000 movies. During the last two years, the domains of the service—combined—had an average of 7.34 million monthly visits, with 1.17 million unique visitors, and mostly popular in Spain (85.07 percent), Chile (2.72 percent), and Mexico (2.04 percent), according to SimilarWeb data. The hosting location is masked using Cloudflare’s reverse proxy service.
- **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 a BitTorrent indexing website with 13.9 million registered users and 2 million active



torrents. It is one of the world's most visited pirate websites, with a global SimilarWeb ranking of 1.281 and a local rank of 119 in Russia. According to SimilarWeb, Rutracker[.]org had 34.23 million visits from 6.12 million unique visitors in August 2024. 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 2024, ThePirateBay[.]org had a global rank of 2,185 and a U.S. rank of 1,561, with 21.75 million visits from 6.26 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 by 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.
- **Ygg[.]re** – Morocco. YggTorrent is the largest Francophone BitTorrent community. In August 2024, Ygg[.]re had a global rank of 2,824 and a rank of 151 in France, with 14.33 million visits from 1.61 million unique visitors, according to SimilarWeb. The majority of visits originated from French-speaking countries, including France (70 percent), Canada (6.72 percent), Algeria (4.3 percent), Belgium (5.24 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 Amaratu'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 64.18 million total monthly visits from 8.7 million unique visitors in August 2024, according to SimilarWeb, which ranks it 634 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 19.1 percent of its traffic. The site has worldwide appeal due to its vast library of quality torrents, but also the accompanying subtitle site yifysubtitles[.]org, which 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 Cloud Wall Ltd., 4 Vendeta EOOD (aka Tamatiya EOOD) in Bulgaria, and Private Internet Hosting in Belize.
- **Zamunda[.]net** – Bulgaria. Zamunda[.]net is one of the oldest and most popular pirate services in Bulgaria, and now the top piracy site after the closedown of RARBG. It is ranked as the 34th most visited website in the country. Hosted by Swiss Global, it offers



a range of films and television series and is the go-to site for piracy in Bulgaria. According to SimilarWeb, Zamunda[.]net had 6.82 million visits from 840,147 unique visitors in August 2024. Zamunda[.]net was subject to a blocking order on May 31, 2023, by the Sofia City court. However, Zamunda[.]net and its alternative domains Zamunda[.]ch and Zamunda[.]games are both fully accessible in Bulgaria and Turkey (its secondary target market) at the moment but cannot be accessed from the U.S. or France due to geo-blocking.

### 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 in alphabetical order.

- **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 Bs[.]to 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, 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 the fastest 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, both for 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, we have found content from VOD streaming websites, IPTV services, and sports live streaming websites. 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 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 Gratisfilmer[.]cc, gnula[.]cc, and streamtape[.]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 Netu[.]io, kindor[.]io, kinogo[.]io, and filma24[.]io.
- **.tv Registry** – .tv is the country code top-level domain (ccTLD) for Tuvalu. Examples of infringing websites using .tv domains include soaper[.]tv and loklok[.]tv.
- **.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 rlsbb[.]ru, films-torrent[.]ru, seasonvar[.]ru, and livetv[.]ru.
- **.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 hianime[.]to, 1337x[.]to, solarmovie[.]to, and bs[.]to.



**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,

A handwritten signature in black ink, appearing to read "C. H. Rivkin".

Charles H. Rivkin  
Chairman & CEO