



October 1, 2025

Ambassador Jamieson Greer  
United States Trade Representative  
600 17th Street NW  
Washington, DC 20508

**Submitted via:** <https://regulations.gov>

**Re: 2025 Review of Notorious Markets for Counterfeiting and Piracy: Comment Request (Docket No. USTR-2025-0018)**

Dear Ambassador Greer:

Intellectual Property Owners Association (IPO) submits this response to the Office of the United States Trade Representative's (USTR) request for public comments regarding the 2025 Review of Notorious Markets for Counterfeiting and Piracy (Notorious Markets List). IPO appreciates USTR's continued leadership in addressing global counterfeiting and piracy and welcomes the opportunity to contribute comments for the upcoming Notorious Markets List.

IPO is an international trade association representing a "big tent" of diverse companies, law firms, service providers, and individuals in all industries and fields of technology that own, or are interested in, intellectual property rights. IPO membership includes over 125 companies and spans over 30 countries. IPO advocates for effective and affordable IP ownership rights and offers a wide array of services, including supporting member interests relating to legislative and international issues; analyzing current IP issues; providing information and educational services; supporting and advocating for an IP system that enables innovation and creativity; and disseminating information to the public on the importance of IP rights. IPO's vision is the global acceleration of innovation, creativity, and investment necessary to improve lives.

Below are comments on marketplaces that, based upon reports from its members, IPO recommends including in the 2025 Notorious Markets List.

**Online Marketplaces**

Online platforms remain the leading source of counterfeit goods reported by IPO members. Counterfeiters exploit the relatively lax screening requirements of these marketplaces to offer non-genuine products to consumers. As IPO has previously noted, stronger seller screening and more effective programs to identify and ban repeat offenders would significantly reduce counterfeit sales.

IPO is encouraged that several marketplaces have continued to proactively engage with and present their plans for addressing counterfeit goods to IPO members. While it welcomes these efforts, IPO continues to monitor whether these measures are implemented and enforced effectively.

President  
**Krish Gupta**  
Dell Technologies

Vice President  
**John Cheek**  
Tenneco LLC

Treasurer  
**Yen Florczak**  
3M Innovative Properties Co.

Directors  
**David Alban**  
Xylem  
**Matthew Anderson**  
Medtronic, Inc.  
**Ron Antush**  
Nokia of America Corp.  
**Estelle Bakun**  
Exxon Mobil Corp.  
**Scott Barker**  
Micron Technology, Inc.  
**Thomas Beall**  
Corning Inc  
**Tyrome Brown**  
Dolby Laboratories  
**Dan Choi**  
Microsoft Corporation  
**Brandon Clark**  
SLB  
**Scott Clark**  
InterDigital  
**Tonya Combs**  
Eli Lilly and Co.  
**Jamie Davis**  
Bayer Intellectual  
Property GmbH  
**Anthony DiBartolomeo**  
SAP SE  
**Cass Dottridge**  
Cargill Inc.  
**Andrea Evensen**  
Danaher Corp.  
**Jake Feldman**  
Kenvue  
**Louis Foreman**  
Eventys  
**Darryl P. Frickey**  
Dow Chemical Co.  
**Brian Gaffney**  
AT&T  
**Mike Geise**  
General Mills, Inc.  
**Robert Giles**  
Qualcomm, Inc.  
**Laura Ginkel**  
Merck & Co., Inc.  
**Henry Hadad**  
Bristol-Myers Squibb Co.  
**Aamir Haq**  
Hewlett Packard Enterprise  
**Scott Hayden**  
Amazon  
**Emily Johnson**  
Amgen, Inc.  
**Michael King**  
Caterpillar Inc  
**Thomas R. Kingsbury**  
Bridgestone Americas Co.  
**Laurie Kowalsky**  
Koninklijke Philips N.V.  
**Christine Lam**  
NetApp  
**David Lane**  
Johnson & Johnson  
**Myron Lloyd**  
The Goodyear Tire &  
Rubber Co.  
**Alexander Long**  
GE Aerospace  
**Ceyda Maisami**  
HP Inc.  
**Jeffrey Myers**  
Apple Inc.  
**Sandra Nowak**  
Solventum  
**Hugh Pasika**  
Thermo Fisher Scientific  
**Erik Perez**  
Shell USA, Inc.  
**Troy Prince**  
RTX Corporation  
**Corey Salsberg**  
Novartis  
**Matthew Sarbaroria**  
Oracle Corp.  
**Laura Sheridan**  
Google Inc.  
**Jessica Sinnott**  
DuPont  
**Thomas Smith**  
GlaxoSmithKline  
**Daniel Staudt**  
Siemens Corp.  
**Sarah Tully**  
Roche, Inc.  
**Mark Vallone**  
IBM, Corp.

General Counsel  
**Lauren Leyden**  
Akin Gump Strauss  
Hauer & Feld LLP

Executive Director  
**Jessica K. Landacre**

**Shopee:** While IPO members have seen significant improvements from Shopee in the Latin American region and appreciate the implementation of its 3-Strike Repeat Offender Policy in Southeast Asia and Latin America, members continue to see a high volume of counterfeit listings on the platform. It is recommended that Shopee improve its processes around conducting more thorough vetting of sellers before allowing them to sell on the platform and grouping sellers with common addresses and banking details. Additionally, it is important that Shopee act on all sellers with Know Your Customer (KYC) documents in common to a reported seller.

**Amazon UK & India:** IPO members report that Amazon India does not take action on copyright infringement notifications without first making a test purchase for a specific seller listed on the Amazon listing number (ASIN). For Amazon UK, members note that infringement reports have been rejected and products have remained available for sale even though such products do not meet United Kingdom labeling requirements for the category of goods. Amazon's platforms in these two key markets have proved problematic.

**Taobao:** IPO members report difficulty receiving adequate engagement from this platform. When sellers appeal a reported counterfeit complaint, Taobao's review is limited to formal compliance and does not include substantive verification of the truthfulness of the content. This process penalizes the brand owner.

**Pinduoduo:** This major Chinese e-commerce platform has been a source of reports from IPO members specifically highlighting the platform's inadequate handling of copyright complaints. Pinduoduo's copyright complaint system is burdensome, allowing only one link of evidence per submission and rejecting complaints if images do not exactly match infringing listings. Attempts to seek clarification or support are met with little to no response, limiting effective communication. In addition, the platform restricts multiple team members from logging in at once, significantly reducing enforcement efficiency.

**Noon:** Noon.com is a major e-commerce marketplace popular in the Middle East region. The platform lacks standard brand-protection mechanisms (e.g., a portal to report counterfeit goods) and requires reporting manually through contacting multiple email addresses. The platform has been uncooperative when counterfeit products are reported. The platform also requires proof of test purchase for each time a takedown request is submitted, which is onerous and impractical.

**Jumia:** Jumia is a large pan-African e-commerce platform. It has been inconsistent in its responses to counterfeit notifications from brand owners and sometimes completely ignores complaints.

**Supply Leader:** The website connects worldwide buyers to Chinese wholesalers with an option to select a specific manufacturer to purchase from. The low pricing and direct connection to China are risk factors for counterfeiting.

**Physical Marketplaces**

IPO does not have any information to justify removing any of the markets listed on the 2024 Notorious Markets List. In addition, our members have identified the following physical markets as sources of significant counterfeiting activity.

- **Petaling Street (Kuala Lumpur, Malaysia)**
- **Ben Thanh Market (Ho Chi Minh City, Vietnam)**
- **Saigon Square (Ho Chi Minh City, Vietnam)**
- **MBK Center (Bangkok, Thailand)**
- **Pratunam Market (Bangkok, Thailand)**
- **Talat Mai Don Muang (Bangkok, Thailand)**
- **Mercado San Juan de Dios (Guadalajara, Mexico)**
- **El Santuario Neighborhood (Guadalajara, Mexico)**
- **Deira District (Dubai, UAE)**
- **Cheetham Hill (Manchester, United Kingdom)**
- **Charles House / Bridge Road Trading Estate (Southall, London, United Kingdom)**
- **Trade Fair Complex (Lagos, Nigeria):** The complex is known for hosting many small shop fronts offering wholesale counterfeit and parallel import products for discounted prices and in large quantities. The National Agency for Food and Drug Administration and Control (NAFDAC) and police authorities continuously raid multiple targets on a frequent basis; however, the shops quickly resume their activity of offering the illicit goods after each raid.
- **Bolton Market (Karachi, Pakistan):** The market is known for hosting many small shop fronts offering wholesale counterfeit products for discounted prices and in large quantities. The wholesalers are connected to multiple counterfeit manufacturers in other cities (e.g., Lahore) that supply them with the counterfeits periodically.

IPO thanks USTR for the opportunity to submit these comments and looks forward to collaborating with your office in ongoing efforts to strengthen IP enforcement globally.

Sincerely,



Jessica K. Landacre  
Executive Director