

May 3, 2012

John Cresswell
Chief Executive Officer
Crawley Court
S021 2QA Winchester Hampshire
England

Re: Arqiva and Iran

Dear Mr. Cresswell,

United Against Nuclear Iran (“UANI”) is writing to express its concern about Arqiva’s (“Arqiva”) ongoing business activities in Iran’s telecommunications sector. In particular, we understand that Arqiva is providing services to Islamic Republic of Iran Broadcasting (“IRIB”), a state-owned enterprise which is largely responsible for the ongoing persecution and repression in Iran. As part of our “Tech and Telecom Campaign,” UANI is asking telecommunications companies to clarify the nature and extent of their existing contracts and long-term business goals in Iran. UANI strongly believes that the only responsible course of action for corporations like Arqiva is to end all business activities in Iran, including the service and maintenance of past contracts.

The reasons for our concerns regarding Arqiva’s activities in Iran are manifold. First, Iran has established itself as a clear threat to international peace and security. For years, Iran has been pursuing an illegal nuclear weapons program in defiance of international law. In addition to its nuclear activities, Iran remains the world’s leading state sponsor of terrorism and has sponsored notorious terrorist groups like Hamas, Hezbollah and al-Qaeda.

While Iran’s nuclear and terrorist activities should serve as sufficient justification for a corporation to pull out of Iran, the regime’s serious human rights abuses and neglect of basic freedoms should also be of concern to Arqiva. As you know, the regime’s official state programming, including that of the IRIB, is used as a tool to spread hate speech against peaceful activists and to publicize the interrogation and coerced statements of citizens unjustly imprisoned by the regime. (*Wall Street Journal*, “[Broadcasting Tehran's Repression](#),” 12/9/2011) UANI is concerned that corporations such as Arqiva are allowing their technology to be used to perpetrate these illicit and inhumane actions.

By providing services to the Iranian state-owned IRIB, Arqiva is directly supporting the brutal Iranian regime. Specifically, IRIB is notorious for broadcasting libelous programs and disseminating hate speech against religious minorities, peaceful dissidents and civil society activists in Iran. IRIB is also responsible for producing and broadcasting various “show trials” of

Iranian prisoners. IRIB camera crews have reportedly acted as interrogators in Iranian prisons and recorded prisoner “confessions” for later broadcast. These televised “show trials” reportedly resulted in the conviction of over 100 Iranian activists in August 2009 alone. (*Wall Street Journal*, “[Broadcasting Tehran's Repression](#),” 12/9/2011) By irresponsibly facilitating the dissemination of such programming, Arqiva is directly furthering the Iranian regime’s campaign of persecution and repression against its own citizens.

Arqiva should also be aware of legislation that could directly impact Arqiva’s ability to procure U.S. government contracts. First, section 106 of *The Comprehensive Iran Sanctions Accountability and Divestment Act of 2010* (“CISADA”) requires the U.S. to ban the “procurement of goods or services with a person that exports sensitive technology to Iran.” CISADA defines sensitive technology as “hardware, software, telecommunications equipment, or any other technology” that is used to “(A) to restrict the free flow of unbiased information in Iran; or (B) to disrupt, monitor, or otherwise restrict speech of the people of Iran.” More recently, Executive Order 13606 of April 22, 2012, “Blocking the Property and Suspending Entry into the United States of Certain Persons with Respect to Grave Human Rights Abuses by the Governments of Iran and Syria via Information Technology,” sanctions those entities that have “sold, leased, or otherwise provided, directly or indirectly, goods, services, or technology to Iran or Syria likely to be used to facilitate computer or network disruption, monitoring or tracking that could assist in or enable serious human rights abuses by or on behalf of the Government of Iran or the Government of Syria.”

In addition to the potential legal ramifications of Arqiva’s actions in Iran, these activities will subject Arqiva to substantial reputational harm and condemnation from the U.S. public and international community. Groups such as UANI will join others in shining a light on Arqiva’s business practices by educating policy-makers and the public alike.

It is time for Arqiva to follow the lead of other responsible global corporations and end its business activities in Iran, particularly in light of the fact that services and technologies provided by Arqiva are being used to perpetrate terrible crimes against the people of Iran and deny them basic freedoms. The Iranian regime is imperiling the long-term stability of the region, the security of the international community and its own citizens as well as the entire nuclear nonproliferation regime. It is incumbent on all of us, governments, private citizens and corporations alike, to take concrete steps to oppose this ongoing and dangerous threat.

Please let us hear from you by May 11, 2012 regarding Arqiva’s existing and future business plans in Iran.

Very truly yours,



Ambassador Kristen Silverberg

cc: The Honorable Joseph I. Lieberman
Chairman, United States Senate Committee on Homeland Security &
Governmental Affairs

The Honorable Susan M. Collins
Ranking Member, United States Senate Committee on Homeland Security &
Governmental Affairs

The Honorable John Kerry
Chairman, United States Senate Committee on Foreign Relations

The Honorable Richard Lugar
Ranking Member, United States Senate Committee on Foreign Relations

The Honorable Jon Tester
United States Senate

The Honorable Peter T. King
Chairman, United States House Committee on Homeland Security

The Honorable Bennie Thompson
Ranking Member, United States House Committee on Homeland Security

The Honorable Ileana Ros-Lehtinen
Chairman, United States House Committee on Foreign Affairs

The Honorable Howard Berman
Ranking Member, United States House Committee on Foreign Affairs

The Honorable Howard P. McKeon
Chairman, United States House Armed Services Committee

The Honorable Henry Waxman
Ranking Member, United States House Committee on Energy and Commerce

The Honorable Steve Israel
United States House of Representatives

The Honorable Ted Deutch
United States House of Representatives

The Honorable Nita Lowey
United States House of Representatives

The Honorable Carolyn Maloney
United States House of Representatives

The Honorable Gary Ackerman
United States House of Representatives

The Honorable Rob Andrews
United States House of Representatives

The Honorable Steve Chabot
United States House of Representatives

The Honorable Gerry Connolly
United States House of Representatives

The Honorable Henry Cueller
United States House of Representatives

The Honorable Susan Davis
United States House of Representatives

The Honorable Tim Griffin
United States House of Representatives

The Honorable Jim Himes
United States House of Representatives

The Honorable Kathy Hochul
United States House of Representatives

The Honorable Rush Holt
United States House of Representatives

The Honorable Jerry Nadler
United States House of Representatives

The Honorable Bill Owens
United States House of Representatives

The Honorable Ed Perlmutter
United States House of Representatives

The Honorable Adam Schiff
United States House of Representatives

The Honorable Betty Sutton
United States House of Representatives

The Honorable Bob Turner
United States House of Representatives

The Honorable Leon E. Panetta
Secretary of Defense, United States Department of Defense

The Honorable Daniel M. Tangherlini
Administrator, General Services Administration

The Honorable David S. Cohen
Under Secretary for Terrorism and Financial Intelligence, United States
Department of the Treasury

HE Sir Mark Lyall Grant
Permanent Representative of the United Kingdom Mission to the UN

HE Sir Peter John Westmacott
Her Majesty's Ambassador to the United States of America

Sir Nicolas Bratza
President of the European Court of Human Rights

Herman Van Rompuy
President of the European Council

Shirin Ebadi
Defenders of Human Rights Center

David Kramer
Executive Director, Freedom House

Hadi Ghaemi
Executive Director, International Campaign for Human Rights in Iran

Gissou Nia
Executive Director, Iran Human Rights Documentation Center

Peter Shore
Chairman of the Board, Arqiva

Phil Moses
Chief Financial Officer, Arqiva

Doug Umbers
Managing Director, Business Operations, Arqiva

Steve Holebrook
Managing Director, Broadcast and Media, Arqiva

Nicolas Ott
Managing Director, Government, Mobile & Enterprise, Arqiva