September 7, 2012

Mr. Nigel Titley
Chairman of the Executive Board
The Réseaux IP Européens Network Coordination Centre
P.O. Box 10096
1001 EB Amsterdam
The Netherlands

      Re: **RIPE NCC and Iran – Disconnecting Iranian Sanction-Designated Entities from the Worldwide Web**

Dear Chairman Titley:

By this letter, United Against Nuclear Iran ("UANI") calls upon the Réseaux IP Européens Network Coordination Centre ("RIPE NCC") to publicly clarify its work in Iran and to:

1. Terminate its relationship with and deny any Iranian entity or person that has been sanction-designated by the United States, the European Union and/or the United Nations access to and revoke previously assigned internet number resources, including Internet Protocol ("IP") addresses, domain names, and Autonomous System Numbers ("ASNs");

2. Terminate its relationship and deny RIPE NCC access and membership to all sanction-designated Iranian entities and persons, including the Islamic Revolutionary Guard Corps ("IRGC") and the Iranian regime, and;

3. Terminate its relationship and deny database services, technical services and information services to sanction-designated Iranian entities and persons and registrants that service sanction-designated Iranian entities and persons.

As you know, the worldwide web enables people around the globe to communicate with each other through unique assigned web names and numbers. The Internet Corporation for Assigned Names and Numbers ("ICANN") "coordinates these unique identifiers across the world." ICANN "coordinates the Domain Name System (DNS), Internet Protocol (IP) addresses, space allocation, protocol identifier assignment, generic (gTLD) and country code

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(ccTLD) Top-Level Domain name system management, and root server system management functions."[1] (*ICANN Website*, "What Does ICANN Do?" accessed on 09/04/2012)

As a department of ICANN, the Internet Assigned Numbers Authority ("IANA") "allocates and maintains unique codes and numbering systems that are used in the technical standards ('protocols') that drive the Internet." As part of its work, IANA "coordinates the global pool of IP and AS numbers, providing them to Regional Internet Registries (RIR)." (*IANA Website*, "Introducing IANA," accessed on 09/04/2012)

RIPE NCC serves as the RIR for Iran, and its coverage extends to Europe, the Middle East and parts of Central Asia and "provides Internet resource allocations, registration services and coordination activities that support the operation of the Internet globally" (*RIPE NCC Website*, "Homepage," accessed on 08/19/2012). Internet resource allocation is distributed in a hierarchical manner. This means that "IANA delegates large ranges of Internet number resources to the RIRs, which then allocate the resources within their regions to members, Local Internet Registries, National Internet Registries, and end-users" (*The Number Resource Organization ("NRO") Website*, "Regional Internet Registries," accessed on 08/19/2012).

RIRs serve as the primary means for access to the worldwide web for Internet Service Providers ("ISPs"), telecommunication organizations and end-users within particular regions. Any person or entity within the area covered by the RIPE NCC – including Iran – that has registered for an Internet domain name, utilizes RIPE NCC's services.

According to the NRO and your website, the RIPE NCC manages the .ir country code for Iran and supports almost 200 Local Internet Registries ("LIRs") that offer services in Iran (*The NRO Website*, "List of Country Codes in the RIPE NCC Region," accessed on 08/19/2012 and *RIPE NCC Website*, "Local Internet Registries Offering Service in Iran, Islamic Republic of," accessed on 08/19/2012). An Iranian LIR is a conduit for promoting and facilitating these activities, and in total they comprise the sole systemic means for Iran to access the global Internet system.

Attached is a spreadsheet that lists the web addresses for all Iranian sanction-designated entities with web addresses, their respective local/national registrars and the name servers that have been provided to them by IANA through the RIPE NCC (See Exhibit A). No domain name registrant or registrar in the region, including those that provide services to Iranian sanction-designed entities and persons by the U.S., EU and UN, would be able to acquire domain names, IP addresses and ASNs (collectively "Unique Internet Identifiers") without RIPE NCC. It is the key provider on which Iran and the region wholly depends upon for access to the Internet.

Unfortunately, RIPE NCC and the Unique Internet Identifiers that it provides are misused by the sanction-designated Iranian entities and persons to facilitate their illicit operations, activities and communications including support for Iran's rogue nuclear weapons program, Iran's sponsorship of terrorism around the world, and the Iranian regimes brutal crackdown

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[1] As ICANN notes, "these services were originally performed under U.S. Government contract by the Internet Assigned Numbers Authority (IANA) and other entities. ICANN now performs the IANA function." (*ICANN Website*, "What Does ICANN Do?" accessed on 09/04/2012)

against its own people. Disturbingly, that crackdown includes the ruthless censorship of the Internet and other communication access, and the use of tracking technology to monitor, torture and kill freedom seeking dissidents. For example, on December 28, 2011 – the registration day for Iran's March 2012 parliamentary elections – Iranian Prosecutor-General Abdosamad Khoramabadi unveiled a list of election-related Internet crimes, which includes "calling for an election boycott, the publication of counter-revolutionary or opposition logos or website contents, etc." Further, cybercafés in Iran were required to produce ID, install cameras, keep tape recordings and maintain a record of their clients and a list of websites visited. (Reporters Without Borders, "Internet Enemies Report 2012," 03/12/2012)

Prominent sanction-designated Iranian entities have acquired .ir Unique Internet Identifiers from the RIPE NCC. For example, Iran's nuclear brain trust, Malek Ashtar University holds the http://www.mut.ac.ir/ address. Major Iranian banks, including the country's central bank, maintain active websites (e.g. http://www.cbi.ir, http://www.bank-maskan.ir, http://www.bmi.ir and http://www.banksepah.ir). Further, Khatam al-Anbia, which serves as the IRGC's engineering arm with over 812 subsidiaries and is heavily involved in the construction of the Qom/Fordow nuclear weapons facilities, holds the web address of http://www.khatam.com. These sanction-designated entities could not gain such web access without the RIPE NCC.

In no way should ICANN, IANA and RIPE NCC permit such misuse of their web services and Unique Internet Identifiers.   During her remarks at George Washington University in February 2011, U.S. Secretary of State Hillary Clinton stated that the Internet could:

> [E]nable wrongdoing on an unprecedented scale. Terrorists and extremist groups use the Internet to recruit members, and plot and carry out attacks. Human traffickers use the Internet to find and lure new victims into modern-day slavery. Child pornographers use the Internet to exploit children. Hackers break into financial institutions, cell phone networks, and personal email accounts. So we need successful strategies for combatting these threats and more…. (U.S. Secretary of State Hillary Clinton, "Internet Rights and Wrongs: Choices and Challenges in a Networked World," George Washington University, 02/15/2011)

Simply put, the RIPE NCC should not provide the internet communications means that the Iranian regime and the IRGC misuses to censor and deny Internet freedoms to its people, much less to support Iran's illicit nuclear program or its sponsorship of terrorism.

Absent access to the RIPE NCC, the dictatorial regime of Iran would be severely impeded in pursuing its illegal and amoral activities. For each day that the RIPE NCC knowingly continues to provide Iran sanction-designated persons and entities access to the worldwide web, the RIPE NCC will be increasingly complicit in the IRGC and Iranian regime's nefarious behavior. The RIPE NCC must stop transacting with such Iranian entities and persons and deny them access to Unique Web Identifiers, and therefore, the worldwide web. The U.S., EU and UN have enacted a series of sweeping sanctions against Iran. Yet during this period of international consensus and increasing global isolation of Iran, numerous Iranian sanctioned entities continue to acquire and have access to Unique Web Identifiers through the RIPE NCC.

The RIPE NCC should responsibly end all RIPE NCC business and access to Unique Web Identifiers to any U.S., EU or UN Iranian sanction-designated entity or person. As explained below, the RIPE NCC is in violation of law for its provision of services and access to its network to sanction-designated entities and persons. Please immediately cease and desist from providing RIPE NCC access to these entities and persons.

We further understand that the RIPE NCC General Meeting will be held on September 26, 2012 in Amsterdam. UANI has attached a proposed resolution for your consideration at this upcoming RIPE General Meeting that calls for a cessation of the RIPE NCC's work with such Iran sanction-designated entities and persons and the immediate revocation of all of their assigned Unique Web Identifiers. (See Exhibit B) UANI respectfully requests that the RIPE NCC take action to adopt such resolution at the General Meeting.

Such action is immediately necessary because the RIPE NCC's activities in Iran with sanction-designated entities and persons violate various sanctions laws including EU law. The RIPE NCC is headquartered in Amsterdam and is directly governed by the laws of the EU. The EU maintains a list of designated parties that are considered to be, among other things, involved in Iran's nuclear or ballistic missiles activities or affiliated with IRGC. (Council Decision (EU) of 07/26/2010 concerning restrictive measures against Iran and repealing Common Position 2007/140/CFSP) In violation of EU law, the RIPE NCC provides key services to such entities and persons. Additionally, on April 19, 2007, the EU implemented UN Security Council Resolution 1737 (2006) by enacting Council Regulation (EC) No. 423/2007, which has now been strengthened by Council Regulation (EU) No. 961/2010, to provide for:

> [C]ertain restrictive measures against Iran. These measures include restrictions on exports and imports of goods and technology which could contribute to Iran's enrichment-related, reprocessing, or heavy water-related activities, or to the development of nuclear weapon delivery systems, a ban on the provision of related services, a ban on investment related to such goods and technology, a ban on procurement of relevant goods and technology from Iran, as well as the freezing of funds and economic resources of persons, entities and bodies engaged in, directly associated with or providing support for such activities.

(Council Regulation (EC) No. 423/2007 of 04/19/2007 concerning restrictive measures against Iran, para. 2). Regulation No. 423/2007 also empowers the EU to establish, publish and amend a list of banned goods and technology and banned persons and entities that provide support to the Iranian regime and its illegal activities (Council Regulation (EC) No. 423/2007 of 04/19/2007 concerning restrictive measures against Iran, para. 5 and 6). The RIPE NCC is indeed providing crucial services to prohibited entities.

Clearly, the RIPE NCC's provision of the essential means of access to the internet runs afoul of such laws and regulations.

Also by separate correspondence, UANI will contact the IANA and the ICANN that oversee RIPE NCC's activities.

Please understand that we do not seek this action lightly. We fully support internet freedoms and access to all parties. In this case, however, you are providing internet access to a brutal regime that represses its own people and censors and restricts their ability to dissent and publicly reveal the brutality of the Iranian regime. As U.S. President Barack Obama stated during a video message to the Iranian people, "Because of the actions of the Iranian regime, an Electronic Curtain has fallen around Iran—a barrier that stops the free flow of information and ideas into the country, and denies the rest of the world the benefit of interacting with the Iranian people…" as Iran works to control and monitor what its citizens see and hear. (*The White House Blog*, "On Nowruz, President Obama Speaks to the Iranian People," 03/20/2012)

Given the urgency of this matter, please let us hear from you on or before September 17, 2012 with clarifying information on the RIPE NCC's work in Iran, whether or not you will take up this issue during your September 26th General Meeting and your detailed plans to terminate RIPE NCC access to Iranian sanction-designated entities and persons and immediately revoke their Unique Web Identifiers. We stand ready to appear at your General Meeting to present on this urgent issue.

Thank you for your immediate attention to this matter.

Very truly yours,

Ambassador Mark D. Wallace

cc: The Honorable Barack H. Obama
            President of the United States

        The Honorable Mitt Romney
            Republican Nominee for President of the United States, 2012 Election

        The Honorable Timothy Geithner
            Secretary, U.S. Department of the Treasury

The Honorable Hillary Clinton
    Secretary, U.S. Department of State

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

The Honorable A. Elizabeth Jones
    Acting Assistant Secretary of State for Near Eastern Affairs, Bureau of Near
    Eastern Affairs, U.S. Department of State

The Honorable André Birotte, Jr.
    U.S. Attorney, Central District of California

Remco van Mook
    Treasurer, Executive Board, RIPE NCC

Christian Kaufmann
    Secretary, Executive Board, RIPE NCC

Dmitr Burkov
    ICANN Liaison, Executive Board, RIPE NCC

Fahad Al Shirawi
    Member, Executive Board, RIPE NCC

Akram Atallah
    Interim CEO, ICANN

Fadi Chehadé
    Incoming CEO, ICANN

Kuo-Wei Wu
    Chair, IANA Committee of the Board, ICANN

Bill Graham
    Member, IANA Committee of the Board, ICANN

Bertrand de La Chapelle
    Member, IANA Committee of the Board, ICANN

Thomas Narten
    Non-Voting Liaison, IANA Committee of the Board, ICANN

Suzanne Woolf
    Non-Voting Liaison, IANA Committee of the Board, ICANN