

January 25, 2012

Sifiso Dabengwa  
MTN Group President and CEO  
Private Bag 9955  
Cresta  
2118  
South Africa

**Re: MTN and Iran**

Dear Mr. Dabengwa,

United Against Nuclear Iran (“UANI”) is writing to express its concern about the ongoing business of the MTN Group Ltd. (“MTN”) in Iran. Recently, UANI launched its “Tech and Telecom Campaign” to highlight the Iranian regime’s misuse of technology to carry out egregious human rights abuses against the people of Iran. In response to this campaign, a number of corporations, including Huawei and Nokia Siemens Networks (“NSN”), have curbed their business activities in Iran. We now ask MTN to do the same.

The reasons for this call by UANI are manifold. First, Iran has established itself as a clear threat to international peace and security. For years, Iran has pursued an illegal nuclear weapons program in defiance of the international community. The fact that in early January the Iranian regime began enriching uranium at its Fordow facility, hidden deep within a mountain, only further confirms that Iran’s nuclear program is neither peaceful nor civilian in nature. Iran also 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 be reason enough for a corporation to pull out of Iran, the regime’s serious human rights abuses should be of particular concern to MTN. As MTN must know, there is ample evidence of Iran using telecommunications equipment to illegally track, monitor, and in some cases arrest, detain and torture Iranian citizens opposed to the current extremist regime. While UANI recognizes that telecommunications firms do not necessarily condone those activities, it is nevertheless a concern to many that corporations such as MTN allow their technology to be used to carry out egregious human rights abuses.

For example, MTN is a 49% shareholder of MTN Irancell, the second largest mobile phone network operator in Iran. The majority 51% is in turn owned by the Iranian regime, which has exploited the network and telecommunication technology of MTN Irancell to monitor and track the activities and communications of peaceful dissidents in Iran. According to a report in

*The Wall Street Journal*, former MTN Irancell employees have confirmed that “a team from the government's telecom-monitoring center routinely visited the operator to verify the government had access to people's location data. The engineer said location tracking activities have expanded greatly since the system first was installed.” The same report states that MTN Irancell ordered the Chinese telecommunications firm Huawei to suspend text messaging and block the Internet phone service Skype during protests against the fraudulent presidential elections in 2009, and that NSN provided MTN Irancell with equipment capable of intercepting and recording voice telephone calls. (*The Wall Street Journal*. “[Chinese Tech Giant Aids Iran](#),” 10/27/11)

In addition, in 2009 MTN Irancell bought a mobile-positioning center from Ericsson. Iranian security forces have reportedly utilized such mobile positioning centers to pinpoint the location of mobile telecommunications users. (*Bloomberg*, “[Iranian Police Seizing Dissidents Get Aid of Western Companies](#),” 10/30/2011) More recently, MTN Irancell reportedly purchased a system from Creativity Software that enables Iranian security forces to monitor the location of cellular phone users. The system also stores data and can generate reports about a person's movements. (*Bloomberg*, “[Iranian Police Seizing Dissidents Get Aid of Western Companies](#),” 10/30/2011) As co-owner of MTN Irancell, MTN certainly had knowledge of such purchases and by collaborating directly with the Iranian regime, MTN is complicit in facilitating the abuses that occurred in Iran as a result.

To date, MTN's response to the serious charges regarding the use of MTN technology by state security agencies has amounted to empty statements and indifference. This should come as little surprise considering that at a time when other responsible corporations, including telecommunications firms, are ending their business activities in Iran, MTN's business activities are actually increasing. The company has reportedly experienced a 12.1 percent growth in its Iran operations during the past year. (MyBroadband, “[MTN shares contract further on Iran sanctions](#),” 1/5/12)

In short, it appears that MTN is taking advantage of the fact that responsible corporations are leaving Iran, and eagerly filling the void. MTN must end its irresponsible business practices in Iran and, in particular, its direct collaboration with the Iranian regime. On MTN's own website, the company lists “Democracy, Peace, Equity and Justice” as core values integral to effective corporate governance. ([MTN Website](#)) It is time for MTN to apply those principles to its business in Iran, something it cannot do by partnering with one of the world's most brutal and lawless regimes.

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, private citizens, governments and corporations alike, to take concrete steps to oppose this ongoing and dangerous threat.

Please let us hear from you by February 6, 2012 regarding MTN's existing and future business plans in Iran.

Very truly yours,



Ambassador Mark D. Wallace

- 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 Mark Kirk  
United States Senate
- The Honorable Jon Tester  
United States Senate
- The Honorable Robert Menendez  
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 Adam Smith  
Ranking Member, United States House Armed Services Committee

The Honorable Steve Israel  
United States House of Representatives

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

The Honorable Martha N. Johnson  
Administrator, General Services Administration

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

H.E. Ebrahim Rasool  
Ambassador of South Africa to the United States

H.E. Baso Sangqu,  
Permanent Representative of South Africa to the United Nations

Shirin Ebadi  
Defenders of Human Rights Center

David Kramer  
Executive Director, Freedom House

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