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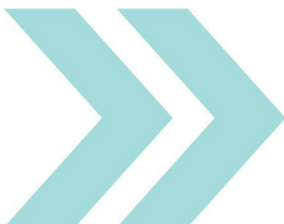
January 4, 2023

To Whom It May Concern:

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, is currently researching the role of your company's products and services in a lawful intercept system used by the Iranian authorities.

We reviewed a series of internal documents and communications providing details on Iran's mobile infrastructure, subscriber management operations and services, and integration with mobile networks. Some of this communication included representatives of the Communications Regulatory Authority of Iran (CRA) and foreign service providers.

The materials describe a "Legal Intercept" system operated by the CRA which allows the agency to undertake detailed surveillance and information controls over all mobile subscribers in Iran. The documents also describe in detail how several non-Iranian based



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firms, including yours, provide commercial services to support Iran's Legal Intercept requirements of mobile surveillance, service control, and account management.

We would appreciate a response from your company to the following questions by **January 11, 2023 at 11:59PM EST:**

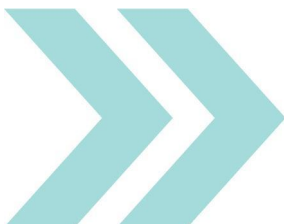
- Does your company require any export licenses prior to exporting technology or technical assistance or services that fall within the scope of dual-use export regulations? If so, have these licenses been obtained?
- Are your company's exports subject to any sanctions regimes related to Iran? If so, how have you ensured compliance with these regimes in the sale of technology or technical assistance or services to Iranian authorities or companies?
- How does your company ensure compliance with the corporate responsibility to respect human rights as set out in the *United Nations Guiding Principles on Business and Human Rights*?

We plan to publish a report reflecting our research. Provided we receive your response by the above mentioned date and time, we will publish your response in full along with our research report.

Sincerely,



Professor Ronald J. Deibert  
Director of the Citizen Lab  
Munk School of Global Affairs & Public Policy  
University of Toronto



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