

October XX, 2022

Sundar Pichai
Chief Executive Officer
Google LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Andy Jassy
Chief Executive Officer
Amazon Web Services
410 Terry Avenue North
Seattle, WA 98109

Tim Cook
Chief Executive Officer
Apple Inc.
1 Infinite Loop
Cupertino, California

Mark Zuckerberg
Chief Executive Officer
Meta Platforms Inc.
1 Hacker Way
Menlo Park, California 94025

Satya Nadella
Chief Executive Officer
Microsoft Corporation
One Microsoft Way
Redmond, WA 98052

Yancey Spruill
Chief Executive Officer
Digital Ocean
101 Avenue of the Americas
New York, NY 10013

Dear Mr. Pichai, Jassy, Cook, Zuckerberg, Nadella, and Spruill:

We write you concerning the recent issuance of General License-D2 (GL-D2) by the Department of the Treasury and urge your companies and their subsidiaries to utilize the new license and expand lawful access of key communications services to Iranians inside Iran. In response to nationwide protests, the Iranian regime has sought to suppress the protests with force, mass detentions, and has severely restricted internet and communication services. It remains vitally important that Iranians retain connections to the outside world, access to sources of independent information, and remain connected to one another. We ask your companies to provide expeditiously and lawfully the tools Iranians need to circumvent government blockages.

Following the death of 22-year-old Mahsa (Zhin) Amini while in custody of Iran's "morality police," Iranians have sustained protests across the country to demand an end to structural discrimination laws and government repression. In addition to its security response, the regime has also caused a near-total disruption of internet connectivity in parts of Iran and blocked various messaging platforms and video games with chat functions.

We commend the Department of the Treasury for issuing GL-D2¹ in response to congressional calls to expand unrestricted internet access in Iran, particularly censorship circumvention technologies. While we appreciate some of the steps your companies have taken, we believe your companies can be more proactive in acting pursuant to the broad authorization provided in GL-D2. We ask that you work expeditiously to ensure these technologies, which would be the most useful to Iranians, get consideration:

- **Cloud & hosting services:** These services are vital for Iranians to move off insecure domestic data infrastructure controlled by government institutions. Returning these services to Iranian civil society and citizens will enable more adaptive responses to government-imposed internet shutdowns, including running their own VPNs and creating safe data storage.
- **Messaging platforms and other communication tools:** Expanding the number of messaging platforms makes it harder for Iranian authorities to shut off all communication at once. In addition, private messaging services provide more ways for Iranians to remain connected while lessening dependence on government-controlled infrastructure.
- **Developer and analytics tools:** Developer software and services will make it easier for Iranian civil society to create and harden their own secure communications apps and virtual proxy

networks (VPNs) to circumvent government filters. Access to analytics software would also improve their own tools and avoid Iran-based analytic services, which have a nexus with government institutions and collect customer data. Domain, routing, and hosting services, along with security certificates and privacy enhancing technologies, would likewise improve resilience.

- **Access to app stores:** Iranians ought to have access to app stores that let Iranians upload their apps on a secure distribution platform and provide an alternative to Iranian app stores, which risk surveillance.

We encourage you to take advantage of GL-D2 and engage directly with the Department of the Treasury to understand fully the licensed activities under the GL-D2. We also ask that you identify and share any obstacles that remain to providing communications services and tools (software or hardware) to Iranians in Iran, whether in law, policy, or the business environment. Iranians are fearlessly risking their lives for their fundamental rights and dignity. Your tools and services may be vital in their efforts to pursue these aspirations, and the United States should continue to make every effort to assist them.

Sincerely,

ⁱ General License D-2, Office of Foreign Assets Control, Department of the Treasury, September 23, 2022.
https://home.treasury.gov/system/files/126/iran_gld2.pdf