



October 14, 2022

President Joseph R. Biden
1600 Pennsylvania Ave NW
Washington, DC 20500

Dear President Biden,

Your administration has taken several important steps to show solidarity with the people of Iran as they challenge their nation's mandatory hijab laws and the state's brutal repression. This includes imposing targeted human rights sanctions on the so-called morality police and other officials culpable in human rights violations, as well as your efforts to broaden sanctions licensing to begin to ensure that US policies support rather than undermine the Iranian people's demands.

However, there is much more that the administration can do to stand in solidarity with the people of Iran and support the Iranian-American community. This includes:

Broaden licensing to facilitate remittances

Many members of the Iranian-American community have reached out to us asking how they can support protesters in Iran, including whether there are options to send remittances to family to support them during this period of unrest. Currently, there is not an easy option for families to send remittances and support their loved ones during this violent crackdown by Iranian government security forces.

While US sanctions regulations do appear to permit remittances to be sent under the Iranian Transaction and Sanctions Regulations (ITSR), the requirement that remittances be either hand-carried or processed by a U.S. depository institution is overly restrictive under current sanctions. As you are well aware, the entirety of the Iranian financial sector is subject to overlapping sanctions and thus U.S. depository institutions do not maintain correspondent banking relations with Iranian banks.

We urge you to revisit sanctions licensing to broaden authorizations for U.S. persons to send remittances to family members, including through money service businesses, exchange bureaus and digital currencies.

Public-Private Partnership for online communication tools



We appreciate your administration's efforts to ensure that sanctions do not block the people of Iran from securing online communication tools via the publication of General License D-2. This should enable tech companies to reenter the Iranian market and offer their services to Iranians that had previously pulled out due to perceived sanctions compliance obligations. It is a critical step that can provide the Iranian people with new tools against online censorship, surveillance and internet blackouts.

However, a major restraint on the effectiveness of this licensing is the lack of any viable financial channels between the US and Iran. While General License D-2 does authorize U.S. depository institutions to process transactions related to fee-based services, software and hardware authorized in the license, there is little to no indication that financial institutions will take advantage of the underlying authorization and facilitate transactions the US government rightly believes to be in the national interest. As a result, some of the tech companies that we have consulted believe the license remains rather limited, as much of the services that could be available to Iranians are fee-based and there is no viable way for them to be compensated for them.

Given this thorny situation and the restraints on the US government directing private banking institutions to take any specific actions, we believe a solution could come from a public-private partnership to compensate tech companies for the provision of their services to the Iranian people. A pool of funds started by interested private companies and later buttressed by US legislation could provide all the funds needed to support the provision of cloud technologies, safe virtual private networks (VPN) and other software and communications tools to the people of Iran in the near term. This would expand the effectiveness of government licensing and provide the Iranian people with new tools against the repression of their government more quickly than waiting on a technical banking solution.

Prioritize refugee applications and visa processing for students

The Iranian government's brutal crackdown is targeting a broad swathe of Iranian society, including students, artists, journalists and human rights defenders. As the US government rightly targets human rights violators with sanctions and seeks to broaden communication tools for those in Iran, it is also important to consider steps to provide safe harbor for those who are now targets of the Iranian government due to their political activism.

The US government has long provided refugee status for individuals from Iran, including those targeted and threatened by authorities amid protests over the years and those persecuted due to their religious beliefs. However, both refugee resettlement and visa processing from Iran were decimated under the prior administration's Muslim ban. Moreover, the National Iranian American Council has warned about mistreatment of Iranian students at America's borders where they



have been routinely intimidated by CBP officials and unjustly deported - including as recently as a few weeks ago.

The US has a clear obligation to increase its processing capacity for Iranian nationals who are at risk of being killed for speaking up for their rights. This obligation is particularly clear for Iranian students, who have been repeatedly and brutally attacked by Iranian security forces including at the prestigious Sharif University of Technology. We encourage the administration to speed up processing of visas and refugee admissions for Iranian nationals - with a priority on those under immediate threat and seeking asylum as well as students. This should include explicit direction and additional support for US embassies and consulates at Dubai, Yerevan, Ankara and any other locations that can service Iranian nationals in the region.

Sincerely,

A handwritten signature in black ink, appearing to read "RC", is positioned below the word "Sincerely,".

Ryan Costello
Policy Director, National Iranian American Council

CC: National Security Adviser Jake Sullivan, Secretary of State Antony Blinken and Secretary of Treasury Janet Yellen