



By E-mail and FedEx

August 10, 2018

Jama Abdi, President
National Iranian American Council
1629 K Street NW
Suite 503
Washington, DC 20006

RE: Your letter of August 8, 2018

Dear Mr. Abdi,

Thank you for reaching out to discuss your concerns as described in your letter of August 8, 2018 and your e-mail to our Board Co-Chairs on the same date. We write on behalf of edX including our Board Co-Chairs. As the only leading provider of massive open online courses that is nonprofit, open-source, and mission-driven, edX takes seriously its commitment to provide affordable access to high-quality, online education. We share your interest in making edX courses broadly available, worldwide.

We value your organization's efforts to vigorously serve the Iranian American community through a mission to strengthen its voice and promote greater understanding. We appreciate the need, as a mission-driven organization, to communicate directly about these interests. We care deeply about extending quality education to learners all over the world, and therefore have reviewed the issues you have raised carefully. Having completed a thorough review, we believe that edX's approach to compliance is appropriate and not the source of the concerns you raised. We summarize our findings below in hopes of clarifying this view.

To begin, your website suggests that edX goes "beyond standard" with respect to sanctions enforcement. However, as noted in your letter, edX actually has a history of seeking *relief* from sanctions by pursuing specific licenses. In other words, edX spends extra time and energy to offer as many courses as legally permissible. In service of our mission, we have chosen the more complicated path precisely *because* it serves the interests of learners including your community.

Still, managing exports in an online setting is challenging. With over 17 million learners worldwide, edX necessarily relies on an automated approach. This approach uses a combination of account profile and learner activity (IP address) to identify location. With respect to account profile, learners self-report their country of *residence* (not their country of *origin*). In this recent case, however, it appears that some learners self-reported as being resident in Iran, when in fact they were of Iranian nationality but ordinarily resident elsewhere. This mix-up has not previously surfaced as a point of confusion among learners, and we do not know why it occurred. Importantly, neither our approach nor any outcome is the result of discrimination, overreaching, or over-enforcement by edX.

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As soon as edX realized the issue, we took steps to support learners and minimize the possibility of future impact. For example, we adopted a new protocol for the edX Learner Support team to receive concerns from impacted learners, clarify the basis for un-enrollment, and process requests for reconsideration where appropriate. We continue to encourage learners who have questions to contact our Support team at info@edx.org. We pulled and manually reviewed records to confirm that the basis for un-enrollments was tied to an appropriate application of our automated methodology. Also, based on this experience, we are reviewing our methodology and learner communications for improvements that may reduce the potential for (and consequences of) errors in self-reporting by learners going forward.

In the meantime, as you noted, edX's specific license for Iran has expired. As a matter of internal policy, we limit external discussion of specific licenses, but can share that we earlier requested a renewal of the license (which addressed the types of courses that may be offered) and continue to await a response. We have not received a rejection and remain hopeful that a renewal will be granted.

We regret that U.S. laws place any restriction on access to our courses, and we hope that our communication here has provided you with greater understanding of the work done by edX to promote availability as much as permissible. In recognition of our common interests, we ask that you collaborate with our Communications team to correct the misinformation about edX on your website, social media, and other public forums where you may have made similar statements expressing your concerns. Alice Randall, Senior Manager, Communications, welcomes your prompt outreach and is available directly at [REDACTED]

If you have additional questions or concerns going forward, please feel free to contact us directly at [REDACTED]. Again, we thank you for your outreach, and we look forward to a productive collaboration.

Kind Regards,

A handwritten signature in blue ink, appearing to read 'Adam Medros'.

Adam Medros, President and COO

A handwritten signature in blue ink, appearing to read 'Nell Ma'luf'.

Nell Ma'luf, VP and General Counsel

Cc: Alan Garber, edX Board Co-Chair and Provost, Harvard University
Martin Schmidt, edX Board Co-Chair and Provost, Massachusetts Institute of Technology

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