



June 1, 2022

Kevin Chen
CEO
italki
Suite 2004, 20/F, Tower 5
China Hong Kong City, 33 Canton Road,
Tsim Sha Tsui, Kowloon, Hong Kong

Dear Mr. Chen,

We are writing on behalf of the National Iranian American Council (NIAC) - the largest Iranian-American grassroots organization in the United States - regarding italki discontinuing services for Iranian nationals. We heard directly from a number of users - including tutors in Iran - who have been harmed by your recent policy change,¹ which appears unnecessary and which we urge you to revisit.

Users based in Iran and those who had recently traveled to Iran received notification that “italki is planning to stop service in your region on 6/25/2022,” and “italki regrets that it can no longer provide service in your region.” Subsequent messaging stated “we are no longer able to support financial transactions and services to specific regions (Iran/Cuba/North Korea/Syria)...Users with IP addresses originating from other regions should face no problems.”

Given the regions targeted for disconnection, italki appears to be engaging in these actions in a bid to comply with U.S. sanctions. However, U.S. sanctions on Iran do not appear to apply to a language learning app platform that simply connects users around the world eager to learn Persian or another language. Moreover, the U.S. has issued explicit general licenses for online communication tools in General License D-1 and academic exchange in General Licenses G & H. It is of course important that italki engage in due diligence, but it does not appear that italki is engaging in any meaningful sanctions compliance risk by servicing users in Iran or who have traveled there. Even if italki assesses that there is a gap in existing general licensing, italki could consult the U.S. Department of Treasury about the scope of its licensing rather than cut off users who have become invested in learning through italki.

It is our firm belief that U.S. sanctions policy should not impact the ability to either learn the Persian language from tutors living in Iran or for Iranians to learn another language via the italki

¹ Regional Service Termination Notice, <https://support.italki.com/hc/en-us/articles/6721468683289>.



platform or any other learning service. Regrettably, italki's decision will make it more difficult for Iranian Americans to learn the Persian language, communicate with their loved ones, and remain connected to their roots.

Just as italki aims to comply with U.S sanctions laws, the same effort should be made to avoid over-complying with sanctions, the results of which are discriminatory against persons of Iranian descent, wherever located.

We welcome a high-level dialogue regarding this matter and encourage italki to take necessary steps for an appropriately tailored sanctions program.

Sincerely,

A handwritten signature in black ink, appearing to read "Javad Akbari". The signature is written in a cursive style and is located below the word "Sincerely,".

President, National Iranian American Council