

Iran

The Islamic Republic of Iran continues to expand and consolidate its technical filtering system, which is among the most extensive in the world. A centralized system for Internet filtering has been implemented that augments the filtering conducted at the Internet service provider (ISP) level. Iran now employs domestically produced technology for identifying and blocking



objectionable Web sites, reducing its reliance on Western filtering technologies. The regulatory agencies in Iran charged with policing the Internet continue to expand. The Revolutionary Guard has begun to play an active role in enforcing Internet content standards. In conjunction with expansive surveillance, this increase in regulatory attention exacerbates an online atmosphere that promotes self-censorship and discourages dissenting views. The blocking of political Web sites during the 2009 presidential elections energized opposition to Internet censorship within Iran and has brought fresh attention to the issue of press controls.

Background

Speech in the Islamic Republic of Iran is heavily regulated. The limits on freedom of expression in Iran are grounded in the constitution, and speech restrictions extend

RESULTS AT A GLANCE					
Filtering	No Evidence of Filtering	Suspected Filtering	Selective Filtering	Substantial Filtering	Pervasive Filtering
Political					•
Social					•
Conflict and security				•	
Internet tools					•

Other Factors	Low	Medium	High	Not Applicable
Transparency		•		
Consistency			•	

KEY INDICATORS	
GDP per capita, PPP (constant 2005 international dollars)	10,346
Life expectancy at birth (years)	71
Literacy rate (percent of people age 15+)	82
Human development index (out of 179)	84
Rule of law (out of 211)	165
Voice and accountability (out of 209)	191
Democracy index (out of 167)	145 (Authoritarian regime)
Digital opportunity index (out of 181)	105
Internet users (percent of population)	31.3

Source by indicator: World Bank 2009a, World Bank 2009a, World Bank 2009a, UNDP 2008, World Bank 2009b, World Bank 2009b, Economist Intelligence Unit 2008, ITU 2007, ITU 2008.

over a broad range of topics, including religion, immorality, social harmony, and politics. In comparison to the well-developed state controls over print media, radio, and television, the Internet initially offered a relatively unfettered medium for communication in Iran, allowing independent media and opposition voices to flourish.¹ The Internet also has provided Iranian expatriates a platform for publishing opinions in opposition to the government, such as pro-secular and reformist political viewpoints, outside the reach of standard offline strategies for enforcing speech restrictions. The growing popularity of the Internet has led to increasing government scrutiny. Dissenting voices online, including human rights activists, bloggers, and online media outlets, have become the target of government regulatory action and are subject to arrest, imprisonment, and torture.² Internet control mechanisms have continued to grow in scope and scale to address this digital challenge to information control in Iran. Regulators have invested in more sophisticated technical control mechanisms, and new regulatory agencies have been created to identify and block expression deemed offensive. The presidential elections in 2009 led to an increase in online political organizing, which provided a further impetus for increasingly contentious controls on the Web sites used by legitimate opposition contenders.

Efforts to control online speech by the Iranian government have relied primarily on large-scale Internet filtering and the threat of targeted legal action. The declaration of a spokesman from the Revolutionary Guard to launch 10,000 blogs written by members of the Basij, a volunteer Iranian paramilitary force under the authority of the Iranian Revolutionary Guards, hints at the adoption of a different strategy for shaping online information: a government-backed war of words on the Internet.³ This is similar conceptually to the government information dissemination strategies seen in just a small number of countries—for example, the *Fifty Cent Party* in China, where workers are reportedly paid for producing progovernment content, and in Russia, where pro-Kremlin bloggers are suspected of receiving government support.⁴

Internet in Iran

Internet usage in Iran continues to increase at a sharp rate. Over the past eight years, the number of Internet users in Iran has grown at an average annual rate of approximately 48 percent, increasing from under 1 million Internet users in 2000⁵ to around 23 million in 2008.⁶ This rate of growth is higher than any other country in the Middle East. Internet users now account for approximately 31.3 percent of the population of Iran. This Internet penetration rate is considerably higher than the Middle East average of 23 percent.⁷

The Persian blogosphere has been heralded as one of the largest and most active in the world. The number of active Persian blogs is estimated to be approximately 60,000—a formidable number of independent voices for a country accustomed to tightly controlling the press.⁸

Iranian Internet policies reflect a strong tension between the regulatory urge to reign in free speech and the promotion of innovation and economic growth supported by expanding access to information and communication technologies (ICT). Bolstered by the strong growth in Internet penetration in Iran, Iran's Fourth Five-Year Development Plan called for enhanced broadband penetration, with 1.5 million high-speed Internet connections nationwide.⁹ However, in October 2006, the Ministry of Information and Communications Technology (MICT) issued an order that appears to have been designed to thwart household access to broadband Internet, forbidding ISPs from providing Internet connectivity to households and public Internet access points at speeds greater than 128 Kbps. This policy, which restricts the ability of Internet users to download multimedia content, is likely intended to inhibit online alternative media sources that might compete with the tightly controlled radio and television media in Iran and to hinder access to alternative media sources.¹⁰

At the time of this order, approximately 250,000 users had access to high-speed Internet service, with demand continuing to grow.¹¹ Over the prior two years, 11 companies had been licensed to provide such high-speed services and had invested significant capital in importing the required machinery and setting up the required infrastructure. These regulations on Internet access speed were met with intense opposition, including a campaign to overturn the policy by members of parliament.¹² Reports at the time suggested that the restrictions would be lifted once more effective content control mechanisms were put into place. However, the ban on high-speed service for households and public access points remains in place, although universities and private businesses are able to obtain high-speed broadband service. Before this policy was enacted, fiber-optic networks had been expanding rapidly in Iran, more than doubling from 2005 to 2007.¹³ The growth of fiber-optic networks in Iran has since dropped off precipitously.¹⁴ Mohammad Soleimani, Minister of Information and Communications, publicly defended the ceiling on access speeds and indicated that

slower speeds are adequate and that there is no demand for higher speeds.¹⁵ Iran is the only country in the world to have instituted an explicit cap on Internet access speed for households.

Efforts to gain control over the Internet were already under way in 2001, when the government of Iran asserted control over all Internet access points coming into the country.¹⁶ Commercial ISPs in Iran that offer Internet connectivity to the public are required to connect through the state-controlled Telecommunication Company of Iran (TCI).¹⁷ OpenNet Initiative research corroborates that ISPs offering Internet service to the public all connect through TCI. The other international connections to the Internet are associated with research and academic organizations. Designing the Internet infrastructure around a government-managed gateway—rare for a country with this many Internet users—offers a central point of control that facilitates the implementation of Internet filtering and monitoring of Internet use.

Legal and Regulatory Frameworks

Speech regulation in Iran is rooted in its constitution, which declares that “the media should be used as a forum for healthy encounter of different ideas, but they must strictly refrain from diffusion and propagation of destructive and anti-Islamic practices.”¹⁸ Applying these principles to the Internet has proven to be difficult. A number of government regulatory initiatives have been launched over the past decade to assert control over online communications, although the legal status of Web sites and blogs continues to be contested.

The legal and institutional basis for the technical filtering system in Iran grew out of a series of decrees passed down by the Supreme Council of the Cultural Revolution (SCRC) in December 2001 that required ISPs to employ filtering systems.¹⁹ An inter-agency committee, the Committee in Charge of Determining Unauthorized Sites (CCDUS), was set up a year later to set criteria for identifying unauthorized Web sites to be blocked.²⁰ This committee also decides on the blocking of specific domains. The SCRC issues guidelines to this committee and oversees committee members, who include representatives of MICT, the Ministry of Culture and Islamic Guidance (MCIG), the Ministry of Intelligence and National Security, and the Tehran Prosecutor General.²¹

The implementation of the filtering decisions is charged to a filtering division within the Information Technology Company of Iran (ITC), an agency under MICT.²² Another agency, the Communication Infrastructure Company, has been given the task of unifying filtering across Iran.²³

Iran has promoted the development of domestic tools and technical capacity to carry out Internet filtering in order to reduce its reliance on Western technologies. Prior ONI research reported the use of SmartFilter, a product of the U.S.-based firm Secure Com-

puting, for filtering Internet content.²⁴ Secure Computing denied any knowledge of the use of their products in Iran.²⁵ The use of Western technology was problematic for both the companies involved and the Iranian government. For the companies, involvement in Internet censorship in Iran was a public relations liability, as they were viewed as contributing to the suppression of legitimate speech, if not breaking U.S. law by violating trade sanctions against Iran. For the Iranian government, the reliance on Western technologies was seen as a source of weakness and a potential vulnerability for the integrity of the Iranian Internet. Some within Iran were concerned that Western software might include a “backdoor” that would give outsiders access to key infrastructure.²⁶

Several Iranian technology companies are now producing hardware and software products for use in the Iranian filtering system.²⁷ Domestically produced technology is currently used for filtering. Iranian technology is also used for searching the Internet for objectionable content and tracking keywords and links to banned Web sites, which are used by filtering authorities to make blocking decisions.²⁸ With the emergence of this domestic technical capacity, Iran joins China as the only countries that aggressively filter the Internet using their own technology.

The legal structures for enforcing speech restrictions in Iran are ambitious in their reach and offer authorities several alternatives for targeting objectionable speech and implementing the wide mandate to curtail a broad range of impermissible speech in Iran. Significant ambiguity in the statutes and directives used to regulate speech in Iran leaves the agencies charged with executing these laws with broad discretionary powers.

The Press Law of 1986 is the principal instrument for regulating media in Iran and frames the boundaries of permissible speech by media. This legislation is unusual in that it not only describes restricted speech but also lays out normative objectives for the press, who are required to “propagate and promote genuine Islamic culture and sound ethical principles.”²⁹ The Press Law outlines broad restrictions on speech, including prohibitions on “promoting subjects that might damage the foundation of the Islamic Republic . . . offending the Leader of the Revolution . . . or quoting articles from the deviant press, parties or groups that oppose Islam (inside and outside the country) in such a manner as to propagate such ideas . . . or encouraging and instigating individuals and groups to act against the security, dignity and interests of the Islamic Republic of Iran.”³⁰ Other provisions prohibit insulting Islam or senior religious authorities.³¹

The application of this law to Web sites and blogs in Iran has been contested. An amendment to the Press Law in 2000 appears to have brought electronic publications under the aegis of the law.³² In April 2009, another amendment to the Press Law was passed by the Iranian parliament that could facilitate the application of Press Law to online sources of content. The 2009 amendment stipulates that “the rules stated in

this Press Law apply to domestic news sites and domestic websites and set out their rights, responsibilities, legal protection, crimes, punishments, judicial authority and procedure for hearings."³³ This article, which was rejected a year earlier when proposed to the previous parliament, was reportedly passed this time with strong pressure from the government of President Mahmoud Ahmadinejad.³⁴ Given the ambiguous wording of the April 2009 amendment to the Press Law, critics say that personal Web sites and blogs may also fall within the new definition, allowing greater scope for inhibiting freedom of expression on the Internet. The government claims that the law now applies to all "Internet publications."³⁵

As applied to Web sites and blogs, the Press Law would not only subject online content to the comprehensive set of speech restrictions in the law, but also require Web sites to obtain a license prior to publication. Bloggers and online media sources would also be subject to the regulatory authority of the Press Supervisory Board under the Ministry of Islamic Culture and Guidance (MICG), which has the power to revoke licenses, ban publications, and refer complaints to a special Press Court.³⁶

Internet "publications" that do not obtain a license under the Press Law, however, are subject to the stricter general laws of the Penal Code and come under the jurisdiction of the general courts. The Penal Code incorporates content-based crimes such as propaganda against the state and allows for the death penalty or imprisonment of up to five years for speech deemed to be an "insult to religion."³⁷ Additional punishable offenses include creating "anxiety and unease in the public's mind," spreading "false rumors," or writing about "acts which are not true." Another provision criminalizes criticism of state officials. Cases heard in the general courts do not have the benefit of a jury trial, which is used only in the Press Courts, increasing the risk for those that opt not to register their Web site or blog.

Both supporters and critics of the 2009 amendment to the Press Law agree that implementing these new provisions is beyond the capacity of current regulatory agencies. Critics suspect that the proximity of the law's approval to the 2009 elections was linked to the incumbent president's desire to limit the influence of reformist candidates in cyberspace.³⁸

Authorities in Iran have struggled for many years with the challenges of regulating speech on the Internet, complicated by the relative ease of anonymous speech online and access to content hosted outside the country. Internet service providers and subscribers are subject to prohibitions on 20 types of activities, where insulting Islam and religious leaders and institutions, as well as fomenting national discord and promoting drug use or obscenity and immoral behaviors, are prominent.³⁹ In 2006, a directive of the SCRC declared Web sites and blogs that did not obtain a license from the MICG to be illegal.⁴⁰ The MICG issued a notice in January 2007 requiring registration by March 1, 2007. A Telecommunications Ministry official, however, indicated that enforcement

was not feasible.⁴¹ The number of blogs that have registered with the state is thought to be very low.⁴²

Another key piece of legislation for regulating online content in Iran is the Bill of Cyber Crimes' Sanctions (Cyber Crimes Bill) ratified into law in November 2008. This bill was still under review by the Guardian Council at the time of writing.⁴³ The bill requires ISPs to ensure that "forbidden" content is not displayed on their servers, that they immediately inform law enforcement agencies of violations, that they retain the content as evidence, and that they restrict access to the prohibited content.⁴⁴ Under the Cyber Crimes Bill, ISPs that do not abide by government regulations (including filtering regulations) will be fined, and with subsequent offenses temporarily or permanently suspended.⁴⁵ The bill also includes provisions for the protection and disclosure of confidential data and information as well as the publishing of obscene content.⁴⁶ A prior draft of the legislation included provisions that made ISPs criminally liable for content transmitted over their networks. These provisions have been removed from the latest draft of the Cyber Crimes Bill.

The role of different government agencies in deciding on blocking, and the legality of doing so, has been a point of contention. The Internet Bureau of the Judiciary has issued mandates to ISPs to block Web sites through court orders, which are considered a form of lawful punishment imposed on legal entities.⁴⁷ Tehran Prosecutor General Saeed Mortazavi, who has led harsh crackdowns on media and has also been implicated in cases of torture of detainees, including 21 bloggers arrested in 2004, has also ordered that certain sites be censored.⁴⁸

The legality of Iran's filtering regime was brought into question following the blocking of the conservative online journal Baztab (formerly baztab.com) in February 2007. Baztab was made accessible inside Iran again after the Supreme Court of Iran ruled against the filtering of the Web site.⁴⁹ This incident sparked a debate within Iranian legal and media circles over the authority of the CCDUS and whether as an executive body of government it was improperly involved in making legislative or judicial decisions.⁵⁰ This debate did not forestall the eventual closing of the offices of Baztab.⁵¹

Surveillance

Iran is reportedly investing in improving its technical capacity to extensively monitor the behavior of its citizens on the Internet. The routing of Internet traffic through proxy servers offers the potential for monitoring and logging essentially all unencrypted Web traffic, including e-mail, instant messaging, and browsing. The architecture of the Iranian Internet is particularly conducive to widespread surveillance, as all traffic from the dozens of ISPs serving households is routed through the state-controlled telecommunications infrastructure of TCI. The MICT, when announcing

the creation of a centralized filtering system, indicated that they would keep a record of Web sites visited by users. A later statement denied that this infrastructure would be used for tracking browsing habits and identifying users.⁵²

In 2008, two European companies reportedly sold a sophisticated electronic surveillance system capable of monitoring Internet use that could be utilized for tracking and monitoring the online activities of human rights organizations and political dissidents. The Telecommunication Company of Iran is said to have received the equipment from Nokia Siemens Networks, a joint venture between the Finnish cell phone maker and the German company Siemens.⁵³ Women's rights activists reported that they were shown transcripts of instant messaging sessions by authorities after their arrest, which, if true, would support the existence of an advanced surveillance program.⁵⁴

ONI Testing Results

The OpenNet Initiative conducted testing in 2008 and 2009 on five ISPs in Iran: ITC, Gostar, Parsonline, Datak, and Sepanta. The testing results confirm that Iran has continued to consolidate its position as one of the most extensive filterers of the Internet. Iran consistently filters a broad range of Web sites that are offensive to the moral standards of Iran's religious leadership. Internet censors in Iran have moved decisively against a number of political targets over the past two years, including women's rights groups, human rights organizations, and political opposition parties.

Filtering in Iran is implemented by routing all public Internet traffic through proxy servers. This allows the employment of filtering software to target specific Web pages as well as the blocking of keywords. The blocking of Web sites is carried out in a transparent manner in Iran; a block page is displayed to users who attempt to access a blocked site with a warning that they are not permitted to access a particular Web site. The block pages, which vary by ISP, generally include a contact e-mail address for users who might wish to contact the filtering administrators to question or contest the blocking of a Web site.

A noteworthy recent development in Iran's filtering regime is the implementation of a centralized filtering regime. Historically, there has been substantial variation in blocking across different ISPs, with several ISPs filtering fewer Web sites than TCI and thereby offering a more permissive view of the Internet.⁵⁵ This variation in access to Web sites was the result of differences in the implementation of government filtering instructions by ISPs. This differential filtering practice has now been effectively replaced by a uniform filtering pattern with the implementation of the supplementary centralized filtering system. The vestiges of the ISP-based system, however, are still apparent: the source of filtering is made evident by the block page that appears, which in some cases comes from the respective ISPs and in other cases from a standard block page issued by TCI. It is unclear what the long-term structure of the filtering system

will be. Options include continuing with the current dual-location filtering system or switching to either a system in which all filtering is carried out at a central point or to a distributed but centrally coordinated filtering system. Regardless of the method chosen for implementation, it appears that Iran is firmly on the path toward a centralized filtering system under the control of the government, as carried out in Saudi Arabia, for example.

The Iranian filtering system continues to strengthen and deepen. In addition to targeting “immoral” content on the Internet, independent and dissenting voices are filtered across a range of issues, including political reform, criticism of the government, reporting on human rights issues, and minority and women’s rights. A notable change in the scope of filtering in Iran over the past several years has been an expansion of political filtering and blocking of human rights organizations, particularly targeting the women’s rights movement in Iran. Blocking orders issued by CCDUS in May 2008 added many new Web sites to the blocking lists. These included numerous Web sites and blogs of women’s rights and human rights activists in addition to several well-known journalists, including www.roozmaregiha2.blogfa.com and pargas1.blogfa.com. Women’s rights Web sites in Farsi, such as www.we-change.org and feministschool.com, are consistently blocked in Iran.

A prominent example of targeted political filtering is the blocking in February 2009 of www.yaarinews.ir, a Web site created for the planned election campaign of former president Mohammad Khatami. A Web site of the reformist coalition, www.baharestaniran.com, was blocked in March 2008. The blocking of Facebook in May 2009 has proven to be particularly controversial in Iran. Many believe that supporters of President Mahmoud Ahmadinejad were behind the blocking orders, as a reformist candidate for president, MirHossein Mousavi, had been using Facebook for political organizing.⁵⁶ Ahmadinejad has since denied any involvement in the decision to block Facebook.⁵⁷ The blocking of the popular social network Web site was reversed several days later after strong popular opposition to the blocking in Iran.⁵⁸ Facebook had been blocked in the past: ONI testing showed that it was blocked in Fall 2008, with access to the Web site allowed again in February 2009.⁵⁹

The role of speech restrictions in the political realm are also evident in the guidelines passed down from SCRC to CCDUS in April 2009 that defined allowable speech during the 2009 presidential elections for Web sites and ISPs. These guidelines outlined 20 categories of prohibited speech, including “disrupting national unity” and “creating negative feelings toward the Islamic government.”⁶⁰

Independent media Web sites offered only in English are inconsistently blocked, though a number of prominent Western news Web sites have been blocked in Iran. The Huffington Post and the Web site for Al-Arabiya (alarabiya.net) are blocked in Iran. The *New York Times*, available in May 2009, has been blocked on several occasions in the past. Global Voices, an international blog aggregator, was blocked in May 2009.

The Web sites of numerous international free-speech organizations are blocked, including rsf.org, epic.org, citizenlab.org, and eff.org. The Web sites of Amnesty International and the OpenNet Initiative were not blocked in May 2009.

A higher proportion of independent media Web sites in Farsi are blocked than are sites with English-language content. The BBC's Persian service (www.bbc.co.uk/persian) was blocked soon after its launch in January 2009. The introduction of this new broadcast station was condemned by the Iranian government and declared to be illegal.⁶¹ In addition, Iranian.com, roozonline.com, and radiozamaneh.com are among the independent sources of news and opinion that are blocked in Iran.

A popular Farsi social networking and independent news Web site, Balatarin.com, was blocked in 2007, reportedly for a user-contributed post with a link to a Web site that included a rumor of the death of Supreme Leader Ali Hoseyni Khamenei. Strident objections by users to the blocking of [Balatarin](http://Balatarin.com) were not successful in reversing the blocking decision, and [Balatarin](http://Balatarin.com) continues to be blocked.

The Web sites of several ethnic and religious minorities are blocked in Iran, including those associated with the Baha'i faith and Kurdish movements. Web sites that are critical of Islam are widely blocked. A higher proportion of Web sites in Farsi related to religious and minority rights are blocked than those in English.

The blocking of blogs in Iran is focused primarily on individual blogs. However, several blog-hosting services are blocked in their entirety, including www.livejournal.com and www.xanga.com. Also, technorati.com and beingboing.com are blocked.

In fall 2008, the ONI tested a sample of approximately 8,800 blogs, drawing the sample from the blogs in the Farsi blogosphere that had the highest number of links to one another.⁶² Of these, approximately 9 percent were found to be blocked by TCI. A majority of the blogs that were blocked are associated with secular politics and reformist viewpoints. However, blogs from the conservative and religious segments of the blogosphere were blocked as well, several of which apparently included content deemed to be too extreme. Further ONI analysis carried out over a sample of filtered and unfiltered blogs displays a systematic targeting of blogs with oppositional views but with substantial inconsistency; many blogs with solidly dissident views remain unblocked, while other blogs without controversial content are blocked.

Several popular social networking Web sites are blocked in Iran, including MySpace.com and Orkut.com. Prior to being blocked, [Orkut](http://Orkut.com) was highly popular in Iran. Among the more prominent social media Web sites, Flickr.com, www.bebo.com, www.metacafe.com, www.photobucket.com, and delicious.com are all blocked. After several episodes of blocking in the past, YouTube, one of the most popular destinations for Iranian Internet users, was available in May 2009.

Consistent with one of the stated objectives of Iran's filtering policy, pornographic content is heavily filtered. Iran is highly successful in blocking pornography, blocking a vast majority of the Web sites tested by ONI. Sites that include photographs depict-

ing provocative attire are also consistently blocked. Esmail Radkani, of Iran's quasi-official Information Technology Company, claimed in an interview in September 2006 that 10 million Web sites were filtered at that time, 90 percent of which contained "immoral" content.⁶³ Another official was quoted in November 2008 saying that 5 million Web sites were blocked in Iran.⁶⁴ Given the large number of Web sites with sexual content blocked in Iran, neither of these estimates is implausible.

The filtering of material related to sexuality extends as well to Web sites offering content related to sexual education. Approximately half of the dating Web sites tested by ONI were found to be blocked in Iran. OpenNet Initiative testing also found significant blocking of content related to homosexuality, particularly if it had any connection to Iran. A number of Web sites related to drugs, alcohol, and gambling are blocked in Iran, although many remain unblocked.

Web sites that offer tools and techniques for circumventing filters are also heavily filtered. Just as new Web sites with options for circumventing Internet filters are regularly offered by Internet users around the world, blocking lists in Iran are frequently updated to include these new Web sites. A great majority of Web sites offering information about and access to circumvention tools tested by ONI were blocked.

The proxy server filtering strategy also permits filtering by keyword. Web searches that include the keyword "women" are still blocked in Iran. The word "sex" and a broad range of words related to sexual activity both in English and Farsi are blocked. The Farsi word for "photograph" is also blocked.

Conclusion

Iran continues to strengthen the legal, administrative, and technical aspects of its Internet filtering systems. The Internet censorship system in Iran is one of the most comprehensive and sophisticated in the world. Advances in domestic technical capacity have contributed to the implementation of a centralized filtering strategy and a reduced reliance on Western technologies. Despite the deeply held commitment to regulating Internet content, authorities continue to be challenged in their attempts to control online speech. Political filtering related to the 2009 presidential campaign, including the blocking of Facebook and several opposition party Web sites, brought renewed attention to the role of filtering in Iran and shows a clear inclination toward second-generation controls.

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32. Note 2 of Article 1 of Iran's Press Law (as amended in on April 18, 2000) defines electronic publications as "publications regularly published under a permanent name, specific date and serial number . . . on different subjects such as news, commentary, as well as social, political, economic, agricultural, cultural, religious, scientific, technical, military, sports, artistic matters, etc,

via electronic vehicles.” Publications must also have obtained “publication licenses from the Press Supervisory Board in the Ministry of Cultural and Islamic Guidance”; otherwise they “fall out of the scope of the Press law and become subject to General Laws.”

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35. *Ibid.*

36. Article 19, “Memorandum on Regulation of the Media in the Islamic Republic of Iran,” March 2, 2006, <http://www.unhcr.org/refworld/country,,ART19,,IRN,,475e4e270,0.html>.

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