

IEEE Region 8 in a Persian Market

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Abstract — A description is given of the events associated with decisions and actions by IEEE to close the IEEE Iran Section and impose restrictions on IEEE members in Iran from 2000 onwards.

Index Terms —IEEE Policy and Procedures, IEEE Member services, IEEE Regions, IEEE Sections, IEEE Student Branches.

I. IEEE AND IRAN BEFORE THE OFAC [2] INFLUENCE

The Iran Section of IEEE was founded in February 1970. The first visit to Iran by an IEEE President (Arthur Stern) took place in 1975. He wrote briefly about his visit in *The Institute*, October 1999, page 9. The visit was before the fall of the Shah of Iran in early 1979, and subsequent formation of the Islamic Republic after return to Iran of Ayatollah Khomeini.

IEEE Region 8 (R8) Director Kurt Richter visited the Section in 1991.

A second visit to Iran by an IEEE President took place on 20th February, 1999, when Ken Laker, accompanied by R8 Director Rolf Remshardt, flew to Teheran from Frankfurt, by Iran Air. They had been invited by Iran students at a Student Branch Congress in Istanbul the previous year, and the visit was approved by the Iran Section Chair, Dr. Ghaffoori-Fard. An intensive programme of university visits, etc. was arranged, and reported in *The Institute* as 'IEEE Officers find Iranian engineering students ready for 21st century' [4]. In this report is the statement "Laker agreed to an arrangement that will help make it easier for Iranian students to enjoy the benefits of IEEE" – giving no hint of what was to happen shortly after.

By then, and continuing until IEEE ordered them to close down, the IEEE Student Branches in Iran were very active and successful. Their members were largely sympathetic to and understanding of the USA, and so by enforcing sanctions, USA was indirectly risking making the future situation worse rather than better.

The University of Tehran IEEE Student Branch was the first in the Section, approved by IEEE HQ in April 1996, with Regional Activities Board ratification on 14th February 1997.

II. WHAT TRIGGERED THE CONCERNS IN IEEE ABOUT IRAN?

IEEE co-sponsored a conference on Telecommunications (IST 2001) in Teheran, Iran, which took place in September 2001. IEEE in Piscataway, NJ, USA agreed to handle credit card payments of registration fees on behalf of the conference organisers. Attempts to process these payments via the USA

banking system led to questions, uncertainties, and ultimately legal advice to IEEE that what was going on was contrary to the OFAC sanctions, etc. and that IEEE must stop or be at risk of punitive and unaffordable fines. It even led to some IEEE employees becoming afraid that they could face jail sentences. In November 2001, the R8 Secretary was instructed as follows:

"IEEE will not have any presence in Iran and in some other countries. No membership either ... Please respond to all requests negatively."

Initially, it was rather difficult for even some senior IEEE volunteers in R8 to discover what was happening, and why. There were rumours that it was connected with OFAC and with ITAR [4] but no firm information was provided. Apparently independently of this, many US authors of papers accepted for IST 2001 from major US companies did not arrive at the conference, and it seems likely that their employers were warned by lawyers.

III. DURING THE PERIOD OF OFAC INFLUENCE

IEEE members in Iran were sent a letter in 2002, informing them of many restrictions being imposed upon their membership, including:

Permitted to receive only print subscriptions to IEEE journals, no electronic access and to attend IEEE conferences only at non-member rate

Forbidden to serve as an IEEE volunteer or receive any member benefits such as e-mail alias, web account, etc.

IEEE President Joel Snyder informed the Iran Section about all this on 14 January 2002.

Although there were already IEEE Fellows and Senior Members in Iran, it was soon stated that no Iran members would in future be allowed to be promoted to Fellow or Senior Member status.

The reasons given for this action included a fear of IEEE being heavily fined. The IEEE leadership insisted strongly that to continue knowingly in breach of the OFAC regulations would mean punitive fines for IEEE which would probably prevent IEEE's continuing survival. It was this which led directly to the closing down of IEEE Iran Section.

In this process, the Iran Section's Student Branches were forcibly closed, despite their good relationships with other Student Branches and activities elsewhere in R8 and other parts of IEEE, having well-educated students, and clearly being 'strong supporters of IEEE'. If closing them was supposed to enhance the reputation of IEEE and USA among

the young people of Iran, it is difficult to see how it could have been anything but entirely counter-productive.

In the initial letters to Iranian IEEE members and others, it was stated that the Iran Student Members were not only forbidden to have an IEEE Student Branch, but were also forbidden to use the IEEE name or logo in any way. This highlights the paradoxical nature of the advice given, since OFAC regulations would also have forbidden any USA lawyer from operating in Iran, and so any process to prevent such use of name or logo or to enforce the restrictions could surely not have been started without itself breaching the OFAC regulations.

Somewhat later, there was a statement from IEEE that the logo and name could be used by Iranian student member groups (even though IEEE Student Branches as such were still forbidden).

Sudan and Libya were also in the 'forbidden/embargoed' category in R8, but there were no IEEE Operational Units (OUs) there and none planned, and probably very few members, so this had no impact. Two other countries were listed, Burma (Myanmar) and Cuba, but were outside R8. Curiously, several countries which it might be expected to have been on the list were absent (for example North Korea) and in some later reports, Burma was no longer mentioned.

Particularly in IEEE R8, there were substantial concerns over the situation and the IEEE action triggered many adverse responses from R8 students and other members.

The IEEE R8 OpCom discussed the matter and expressed its concern at the effects of the policy but were not in a position to actively oppose it. There was dismay at what was happening and on the damaging effect it was having on the reputation of IEEE in the Region.

The impact of the Iran decision had a substantial impact across R8. Particularly, members of many Student Branches in many countries felt outraged that IEEE was taking this action, seen to be in clear breach of IEEE's claims to be a world-wide organisation which did not discriminate on grounds of race, gender, politics or religion. There was felt by some to be a realistic risk that many IEEE student members might resign and that IEEE Student Branches across R8 might in effect be in danger of collapse. Of course many other members of IEEE had similar feelings to the students and GOLD members, but moderated by 'realism', perhaps because they no longer had the 'idealism' of the younger members.

The IEEE R8 Opcom passed a motion regretting the situation and with the R8 News Editor, prepared an explanatory statement for possible inclusion in R8 News. The text which they proposed was submitted to IEEE Piscataway for 'clearance', where senior staff indicated that they were not in favour of two clauses, as follows:

X: "The serious consequences for Region 8 arising from the situation described by the IEEE President are not only the impact of the loss of IEEE membership services and IEEE activities for those directly concerned, but also the indirect consequences arising from the discovery by many other IEEE members that their involvement in

IEEE activities can be constrained by the laws of a country of which they are not citizens".

Y: "IEEE is a non-political organisation and it is important to appreciate that compliance with laws implies neither approval nor disapproval of those laws".

That these innocuous sounding statements were, in effect, to be 'censored' demonstrates the extent to which the senior IEEE management had their thinking dominated by worries of consequences of failing to comply with every aspect of the OFAC requirements.

Reproduced below are parts of a letter sent in August 2003 by Fredun Hojabri, at that time President of Sharif University of Technology Association (SUTA), to IEEE President Mike Adler and to several other senior IEEE leaders (the text is taken from Hojabri's personal website [5]).

"... In direct violation of its Code of Ethics, Vision, Mission, and Constitution, in the past 18 months:

[a] IEEE has implemented unprecedented restrictive and discriminatory policies towards its Iranian members. Such policies are, apparently, based on arbitrary and unfounded interpretations of economic sanctions imposed by the U.S. government on Iran. IEEE has adopted the unfair practice of retaining its Iranian members for membership statistics purposes and collection of membership dues, while depriving them from almost all member rights and benefits. The only member "privilege" not discontinued to date is receiving hard copy journals. To the best of our knowledge such restrictive and unfair policies and practices are not adopted by other scientific societies and institutions operating in the U.S.

[b] With minor exceptions IEEE has adopted a policy of silence and ignorance towards all inquiries in this regard. A large number of letters, faxes, and email messages from members worldwide have remained unanswered. A petition signed by over 1200 IEEE members last year (including 117 Fellows and 158 Senior Members) objecting to IEEE's discriminatory policies and demanding explanations was totally ignored. This petition also included signatures of 177 scientists and professors working in top universities in the United States who, like others, believed that IEEE's policies and practices should not be politically motivated.

In exceptional cases where IEEE has provided verbal or written responses, only vague references were made to "U.S. laws and regulations" and to policies dictated by the U.S. Department of Treasury, Office of Foreign Asset Control (OFAC). Instead of citing specific regulations for each of its discriminatory policies against Iranian members IEEE has asserted that such regulations exist, and directed the inquirer towards a fruitless search for finding the nonexistent regulations on their own.

More specifically, on behalf of its members and other Iranian electrical engineers and scientists, SUTA asks for clear and unambiguous explanations for the following specific

restrictions imposed by the IEEE on Iranian nationals residing in Iran:

1. Rejecting applications and nominations for membership elevations.
2. Depriving members from any form of web-access.
3. Limiting members (and non-members) from publishing papers in its journals.
4. Disallowing any local activity under the name of the IEEE, and canceling all supports normally given to local organizations.

As mentioned above IEEE has kept its Iranian membership, or for that matter all other members, in dark regarding the above policies and practices. One notable exception is a kind response by Professor Michael Lightner, IEEE's 2003 Vice President for Publications, who relayed parts of IEEE's positions on the above issues to us.

In the following attachments we elaborate on each restriction, the brief explanation provided by Prof. Lightner, and our comments on why OFAC regulations do not support or justify IEEE's decisions.

Gentlemen: what is being jeopardized here is not only the rights of Iranian members, but also the prestige and credibility of the IEEE,.....

We are also ready to meet with you if you find such a dialogue is helpful in resolving these issues....”

This letter is somewhat typical of views expressed by many IEEE members around Region 8 (e.g. not only in Iran).

During this difficult period for IEEE, there was no corresponding constraint on the relationship of IEE (now called IET) with Iran. The IEE Council had a ‘representative’ in Iran, Dr. Sadegh Jamali, and IEE co-sponsored the 10th Iranian Conference on Electrical Engineering in 2002, held at the University of Tabriz, which attracted an attendance of 2500 [6].

IV. PUBLICATIONS OF PAPERS WITH IRANIAN AUTHORS

Initial information from IEEE related to member benefits and the Iran Section closure, but did not reveal much about its position on publications by Iranian authors, although this came to dominate the subject later.

The American Association of University Professors (AAUP), reported on 12th January 2004 to its members as follows:

OFAC apparently held initially that publishing manuscripts submitted by authors in Iran (apparently the test case involved an author in Iran specifically) was prohibited under the embargo, because publication would require the investment of U.S. funds in a product (“the manuscript”) produced on enemy soil. It would therefore be trading with the enemy, which carries serious criminal penalties.

It seems clear in retrospect that IEEE's leadership were aware of this but hoped to keep it confidential in the hope of a resolution. If so, such confidentiality-intent was unsuccessful.

In later discussions, it became clear that acceptance of papers by Iranian authors was permitted by IEEE's interpretation of the OFAC laws, but these authors were not allowed to know recommendations of reviewers (because informing them would be regarded as providing a ‘service’, and so forbidden). Thus, if the papers were considered suitable for publication, they had to be printed ‘as is’ with no corrections to improve accuracy or clarity.

Discussions of all these matters became widespread for a while during IEEE Board Series meetings and the subject was frequently on the agenda of the IEEE Transnational Committee.

There were uncertainties over the regulations about joint publications with Iranian authors. For example, suppose that a Canadian citizen was a joint author with an Iranian national, could reviewers' recommendations be conveyed to these authors? Perhaps only to the Canadian author, raising the question of whether he would be allowed to inform his Iranian co-author of them, or whether that would itself be illegal.

Questions arose about the proper interpretation for Iranian citizens legally living in other countries, for example particularly Iranian professors on sabbatical leave in other countries.

They seemed to be resolved by a “don't ask, don't tell” regime, e.g. IEEE did not have the practice of asking authors about their nationality so unless an author had an Iranian mailing address, IEEE had no mechanism to become aware that he/she was an Iranian author, and so could not apply the sanctions.

How to process a paper from a non-Iranian, living legitimately in Iran and so supplying an Iranian address, does not seem to have been resolved with any clarity.

IEEE seems to have ‘led the way’ in its compliance with what appeared to be the interpretation of the OFAC laws. For example, the publishers of Science refused to comply, saying that the prohibition on publishing goes against freedom of speech. Many other publishers seemed to be unaware of the issue before the publicity about IEEE's approach.

The AAUP report quoted earlier also included the statement: *Presumably this ruling applies to all countries under a U.S. trade embargo. Currently the OFAC website lists those countries as the Balkans, Burma, Cuba, Iran, Iraq, Liberia, Libya, North Korea, Sudan and Zimbabwe.*

Whether or not this was true was apparently never reported in the IEEE context. If the same rules and same consequences had been applied to the countries in the Balkan Peninsula, that would have had a major impact on R8. After the wars in Yugoslavia, by 1992 there were three Sections (Slovenia, Croatia, and Yugoslavia) as well as a Macedonia Section formed in 1997. Depending on how ‘Balkans’ is defined, this might even include Greece (by 2001 an EU country) and Bulgaria. The phrase “... website lists those countries as the

Balkans" suggests that whoever drew up this list supposed that "Balkans" was a nation rather than an (ill-defined) geographical area.

In 2003, IEEE Spectrum published the following report by Jean Kumagai:

On 30 September, the U.S. Treasury Department (Washington, D.C.) informed the Institute of Electrical and Electronics Engineers (IEEE) that it must continue to limit members' rights in four countries embargoed by the United States: Cuba, Iran, Libya, and Sudan. The ruling means, among other things, that the IEEE, the world's largest engineering association (and the publisher of this magazine), cannot edit articles submitted by authors in those countries, making it effectively impossible for most such work to appear in IEEE publications.

V. EXPLAINING THE PROBLEMS TO IEEE SOCIETIES AND IEEE CONFERENCE ORGANISERS

The relative independence of IEEE Societies and IEEE Conference organisers meant that many of them knew little or understood little about the situation regarding OFAC and Iran. The IEEE leadership had to inform them, and the reactions of IEEE Societies to these events was not at all uniform, and frequently not at all supportive of IEEE policy. For example, on 10th May 2002, the IEEE Computer Society Board of Governors, meeting in Portland, Oregon, passed a motion incorporating the following text (and much more):

Whereas our leadership has been called upon to enforce compliance with restrictions on global contributions even for events run outside of relevant jurisdictions, including publication of content from non-IEEE events.....

Resolved that the Board of Governors of the IEEE Computer Society

1) Communicates that b) these restrictions are inappropriate and contrary to the principle of the free exchange of ideas which are essential to the advancement of scientific knowledge.....

VI. ADVICE FROM IEEE PISCATAWAY AND IEEE PRESIDENT RAY FINDLAY.

Clarification was given that it would not help if IEEE were to move all its operations out of the USA, because it would continue to be a non-profit organisation incorporated in the state of New York, and OFAC regulations would still apply to all the USA persons involved and to IEEE as a whole, because IEEE would still be an entity doing business in USA – so providing no 'escape route' from the OFAC laws.

IEEE arranged a meeting of various publishers, with an OFAC representative present, on 9th February 2004. Following that meeting, the American Chemical Society (ACS) announced on 11th February 2004 that it was lifting the embargo, which it had only started applying in autumn 2003 as a result of the OFAC ruling on IEEE. According to the President of Publications of ACS:

"the embargo put us at odds with our own ethical guidelines... It is, frankly, inimical to the advancement of science, which is a worldwide activity...".

He went on to say:

"we now have a much better understanding of what our situation is, what the laws are, and the status of the OFAC ruling."

and he added that *"we felt we were on good legal grounds to challenge the (OFAC) ruling."*

IEEE on the other hand, continued to follow the OFAC advice, to the substantial concern of many IEEE members, and seemed to be interested only in getting approval to 'moderate' the embargo as far as it related to its profitable publications business. The IEEE members in Iran and their lack of a Section, Student Branches, IEEE member services, etc. seemed to be of much less concern to many in the IEEE's senior USA leadership.

In 2003, Science Magazine published the following comment [7]:

"Other scientific societies see things differently. A spokesperson for the American Geophysical Union, which has a dozen members in Iran, says AGU does not consider publishing to be a trade issue and "accepts paper submissions from anywhere in the world." The American Society of Mechanical Engineers echoes that view, as does AAAS, Science's publisher. "We do not put any restrictions on submission or publication of papers based on economic or other sanctions," says Monica Bradford, executive editor of Science."

Independently of this a website www.ieeesanctions.com was set up, to make a petition to try to persuade IEEE to change its position on the 'embargo'. The website no longer exists, of course, but an internet search may reveal quite a lot of information about it.

Another website www.ieeesanctions.org incorporated a petition which requested signatures of those against the 'law' with the statement (spelling mistakes reproduced from original):

"Consequences:

- This decision will destroy IEEE Iran Section!
- More than 1700 individuals affected!
- This decision kill off 20 Students Branches and 6 Student Chapters in Iran Section."

Various people quoted the following in support of their reasoned opposition to the IEEE position:

"... IEEE Code of Ethics promises to "treat fairly all persons regardless of such factors as race, religion, gender, disability, age, or national origin".

" IEEE Constitution shows that "the character of its scope is transnational and the territory in which its operations are to be conducted is the entire world".

During this time, some personal opinions emerged from some IEEE members in USA which were even stronger than the OFAC interpretations, suggesting that IEEE should not make its publications available to any foreign (and by implication,

potential enemy) countries, while others even implied that IEEE should publish only material from these foreign countries – the basis of this being to keep everything secret in case it helped an enemy, and to find out as much as possible about what these ‘enemies’ know. Of course, this is completely contrary to the policy of open publication of scientific and engineering literature as a fundamental component of the advancements of science and general progress, and is also contrary to IEEE’s transnational ambitions and wishes to be a world-wide professional organisation.

Further discussion of the issues was provided in a SIAM online newsletter [8].

VII. AFTER THE OFAC INFLUENCE

Partial resolution of the problems began slowly. On 3rd March 2004, a letter was sent by US Representative Howard Berman to Richard Newcomb, Director of Foreign Assets Control at US Department of the Treasury. The letter was strongly critical of the OFAC decisions regarding IEEE Publishing (described as ‘patently absurd’ and a ‘narrow and misguided interpretation of the law’) and recommended that OFAC grant exemption from the need for a special licence, etc.

In April 2004 IEEE received a response from OFAC which fully resolved that no licenses were needed for publishing works from Iran and that the entire IEEE publication process including peer review and editing was exempt from restrictions.

As a consequence of this and other letters, etc. a final decision of exemption from the OFAC regulations regarding publications took place and restored IEEE’s ‘commercial’ concerns – but left uncertainties regarding Regions, Chapters, Student Branches, etc. Because these did not have a dominant influence on IEEE’s income flows (e.g. unlike publications), IEEE did not pursue these issues with the force that it had used over publications issues.

VIII. RE-ESTABLISHMENT OF THE IRAN SECTION

It was later decided (from new and different legal advice to IEEE) that the closure of the Iran Section had been unnecessary, simply because the formation date of the Section preceded the passing of the laws which made the Section ‘illegal’. So, with some caution, the Section was re-instated, but with the clear proviso that new operational units (Chapters, Student Branches) were not permitted in Iran, nor were the IEEE Student Branches to be re-established (on the basis that they had been formed after the passing of the OFAC laws about Iran). Soon after, some unofficial groupings of student members took place, making, in effect, IEEE Student Branches in every way but the formal sense.

Shortly after that IEEE President Mike Lightner visited Iran and with other adjustments, there was a gradual increase in ‘normality’ – the development of ‘unofficial’ active student branches continued (in name only, they were not allowed any

financial resources, etc. and could have no formal recognition in IEEE), and then GOLD and WIE activities began to develop too (see present Iran Section website).

The visit of Mike Lightner was reported in The Institute, by Kathy Kowalenko, in February 2006:

To help the IEEE re-establish its relationship with its Iranian members, IEEE President Michael Lightner, then President-Elect, attended the conference. While there he visited the research facilities of Sharif University of Technology, Shiraz University, and the University of Tehran, and met with some faculty members at the universities, many of whom were former IEEE members. Lightner also updated members on lingering OFAC issues and encouraged them to rejuvenate their programs during the first meeting the section held since the May decision.

..... Lightner says of his visit to Iran. "They were happy that I came, that they are being recognized as a Section again and that their members are able to participate in activities, and receive IEEE awards. As you might expect, they were perfectly clear about the fact that the restrictions should not have happened and concerned about why they did, but they were happy with the progress we made." Jawad Salehi, chair of the section and a professor of electrical engineering at Sharif University, in Tehran, says it was extremely important for members and others to see the sincerity of the IEEE's top leader. "It really was touching and had a tremendously positive effect on us," he says. "He was extremely effective in regaining the confidence of former IEEE Iranian members. He gave us the moral support we needed to get active again."

IX. WHERE WE ARE NOW

As a result of the distributed volunteer-led nature of IEEE, many holding office in IEEE at the time of the OFAC ‘difficulties’ have now been replaced, following elections, etc. and the more recent volunteers do not have any knowledge of the details of what happened, events which are now ‘history’. As a result, they have no awareness of the interpretation of the OFAC laws with respect to the ‘embargoed’ countries, and so there is a general trend towards normality without a feeling of any strong need for caution about legality.

X. A PREVIOUS IEEE INTERACTION WITH US GOVERNMENT LEGISLATION

There is an interesting comparison with a prior situation around 1977 when authors of publications submitted to IEEE conferences and journals began to report on research results in the area of cryptanalysis and encryption, topics which powerful agencies, particularly the National Security Agency (NSA), wanted to keep completely out of the public domain. This was linked with ITAR rather than OFAC.

The concerns at that time seem to have been initiated by a letter from Joseph Meyer to the IEEE Staff Secretary sent in July 1977, stating cryptographic systems were covered by

ITAR and implying that publication of papers on the subject would require prior US Government approval. Although apparently from a private citizen, it was later revealed that the writer was an employee of the NSA, and so it has since been assumed that he wrote the letter at his employer's behest.

IEEE took a very strong stand in support of authors, and in due course, much of this kind of research did enter the public domain, generally leading to great benefits now taken for granted, e.g. the use of secure methods for on-line banking and commerce, etc. and the almost universal use of bank cash machines (ATMs). It became a legitimate research field for academics. It appears that ITAR currently imposes restrictions only on systems and equipment with a clearly defined military application.

By contrast with the approach taken by IEEE for the cryptography area, the approach to the OFAC sanctions on Iran, Cuba, etc. was characterised by extreme timidity. Whether that was necessary or wise is a matter for others to judge. As an example, the interpretation of OFAC laws to forbid elevation of Iranian IEEE members to Senior Member status and yet to be willing to accept their membership dues and send them printed copies of IEEE journals appears with hindsight to have been irrational, inconsistent and unnecessarily cautious.

XI. THE CURRENT STATUS AND POSITION

The Iran Section is now again in operation and active. It produces a regular Newsletter (mostly in the Farsi language) which is available on-line via the IEEE Iran Section website.

Obstacles to the transfer of money in and out of Iran influences the ease of paying legitimate travel and accommodation expenses of IEEE volunteers in Iran such as those of the IEEE Iran Section Chair when attending the IEEE R8 Committee meetings.

The Iran Section Website [9] lists 26 IEEE Student Branches in the Section, five of which have their own websites.

The Iranian conference which may have 'triggered' this whole episode (the International Symposium on Telecommunication [10]) has continued to be held at two year intervals every autumn at various locations in Iran (except that a change to even-numbered years occurred from IST 2008).

IST 2005, held in Shiraz, has the IEEE logo on its documentation (as well as the IEE and IFIP logos). The IEEE logo is, of course, not present on IST 2003 documentation (although the IEE and IFIP logos are present).

From IST 2008 onwards, the papers of this conference have been listed in IEEE Xplore, and in the IEEE conference database.

The IEEE website has the following statement [11]:

IEEE continues to monitor United States OFAC regulations to ensure that our policies and practices comply with the applicable laws.

There is now an IEEE Sudan Subsection, which includes at least one IEEE Student Branch.

XII. REFERENCES AND DEFINITIONS

- [1] 'In a Persian Market' is the name of a once popular piece of music composed by Albert W. Ketèlbey
- [2] OFAC: 'Office of Foreign Assets Control' - administered by US Department of the Treasury
- [3] The Institute, July 1999, page 3
- [4] ITAR: 'International Traffic in Arms Regulations' administered by US Department of State, Directorate of Defense Trade Controls.
- [5] <http://hojabri.net/dr-hojabris-original-letter-to-ieee/>, copy made on 28 May 2012
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- [7] Owen Gaffney, Science magazine, Vol 301, p1646, 19th September 2003
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