

[text deleted]

[text deleted] Esquire
[text deleted]
[text deleted]
[text deleted]

Dear [text deleted]:

This responds to your letter of February 28, 2001, requesting authorization for [U.S. person] to license access via the Internet to [text deleted] its database, containing [text deleted] to [an entity] in Iran. [U.S. person] also requests authorization to license access to [its database], containing [text deleted] to [an entity in Iran]. We understand that [U.S. person] is a not-for-profit organization [text deleted], and its products can be accessed at more than 900 participating libraries and universities worldwide. It is our understanding that no software or restricted technical data will be exported to Iran in connection with the proposed licensing arrangement.

The importation from any country and the exportation to any country of information and informational materials, whether commercial or otherwise, regardless of format or medium of transmission, are exempt from the Iranian Transactions Regulations, 31 C.F.R. Part 560 (the "ITR"). ITR, § 560.210(c). Because the information provided in [U.S. person's] database falls within the scope of § 560.210(c), the exportation of this information from the United States to Iran is exempt from the prohibitions of the ITR.

In connection with the exportation of the information included within [U.S. person's] online database to Iran, [U.S. person] enables its users to perform searches of its database, whereby [U.S. person's] subscribers submit searching terms to [its database] and the most relevant articles in the database are identified. The inclusion of an electric search function that does no more than search and sort the exempt information in the database is also exempt from the prohibitions of the ITR. Please note, however, that this determination is limited to enabling access in Iran to [its database]. This determination does not apply to any additional products or services that may be offered by [U.S. person] in connection with the use of [its database] in Iran; nor does it apply to technical support,

customer support, or other services that might be provided by
[U.S. person].

A handwritten signature in black ink, appearing to read "Richard Newcomb". The signature is written in a cursive style with a large, prominent initial "R".

R. Richard Newcomb
Director
Office of Foreign Assets Control