Quality of Internet : Iran

Analytical Report on Disruptions, Restrictions, and Internet Speed

Sixth Report - Winter 2026

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TEHRAN

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More than 22 days of complete internet shutdown:

Go Where You Are Awaited!

This time, alongside the recurring statement that "Iran has the lowest-quality internet among the 100 countries with the highest GDP," another statement must be added: "the longest internet shutdown in 2025." The 22-day internet shutdown imposing daily damages of more than 5 trillion Toman (approximately $33.3 million USD per day), persistent network disruptions, and groundless promises to lift restrictions on high-traffic social networks and websites has extinguished the last sparks of hope and trust in the possibility of improving and developing the digital economy.

Over the past six months, in addition to routine advocacy meetings and the delivery of internet quality reports to the Ministry of Communications and the Supreme Council of Cyberspace, we have, in high-level meetings, communicated the irreparable damage of filtering, the widespread internet disruptions in the country, and the lost opportunities to "the President, his deputies and selected ministers of the cabinet," as well as to "the heads of the three branches of government." Despite this, not only did we witness the shutdown of the internet on January 8 and 9, 2026 (18 and 19 Dey 1404), but the decision continued for 22 days.

The central question today is this: in 2026, in the midst of the expansion of the artificial intelligence (AI) paradigm, how can we show the Iranian policymaker that endless restrictions, the routine shutdowns, and deliberate, continuous disruptions of the country's internet are not a security solution, but a strategic mistake a mistake that isolates Iran from the world and directly damages the very concept of "Iran" and the lives of its citizens?

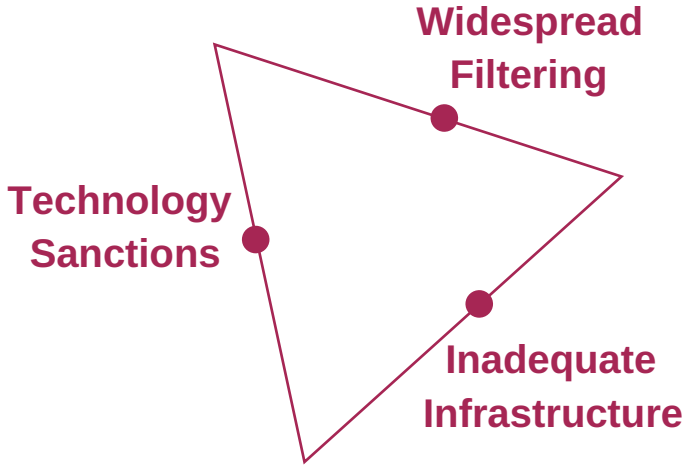
We naively spoke of unblocking high-traffic and useful websites, while the authorities easily settled at the point of "absolute internet shutdown" a decision that directly and knowingly harms hundreds of thousands of businesses, millions of Iranians employed in the digital economy, and, in a real sense, all the people of Iran. A decision from which the government not only does not retreat but easily denies its damages and consequences. Damages whose depth no number can describe. What figure can be equivalent to the closure of thousands of mostly small businesses? What number can measure the despair of young people regarding policy reform in the country? What metric can calculate the destruction of opportunities for people who do not appear in any whitelist or any government priority?

Of course, all of this is said while the policymaker's justification is "preserving citizens' security" through internet disruption and shutdowns. But the fundamental question is: how is it that numerous government organizations and special task forces receiving thousands of billions of Toman of direct funding from public assets when faced with any political event, whether external attack or internal protest, only arrive at the solution of "shutting down the internet"? How is it that this decision even leads to the shutdown of domestic platforms for days? And why, after every shutdown, must citizens wait days for the internet to return to its previous state and demand their most basic communication rights?

And finally, who must we ask: after more than 50 days, why has the current state of the internet which is even more disrupted and slower than before January 8, 2026 (18 Dey 1404) taken this form, and to what end?

Report Summary

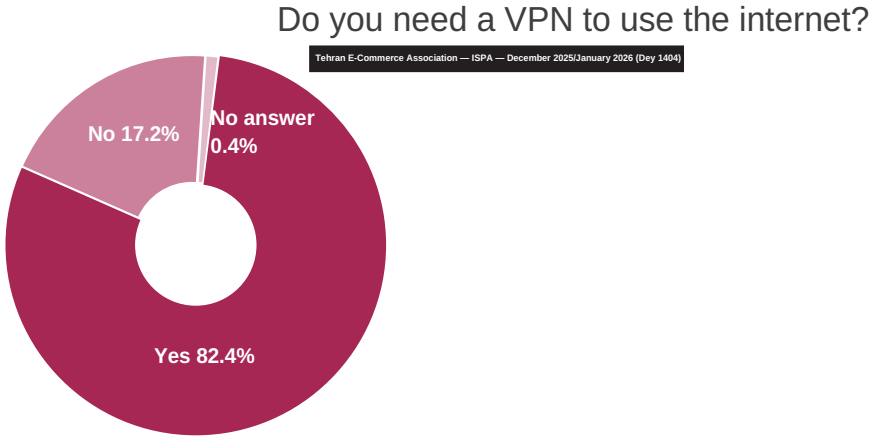
Nearly Half of Iranians Are Willing to Pay More Than Twice the Current Cost for Satellite Internet



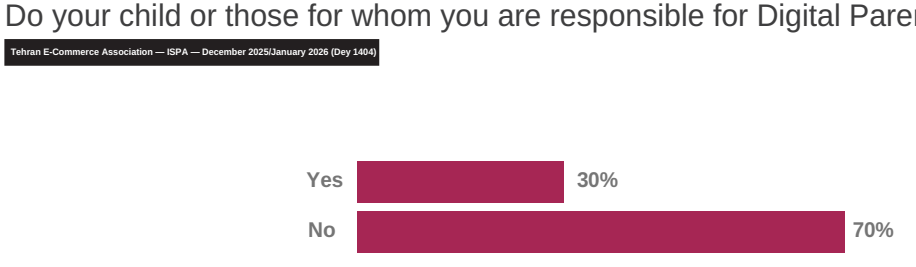
Even if we do not include the days of internet shutdown in winter 2025/2026 (Winter 1404) in the indices that measure internet quality, we are still the champion of low-quality internet in the world! The average state of internet quality in the country up to December 2025/January 2026 (Dey 1404) shows that compared to the fifth report (overall ranking 97 out of 100 countries), with a two-step rise we are now in the position of fifth lowest-quality internet in the world among 100 countries with the highest GDP. If, as in previous reports, we exclude countries that lack sufficient data in the "restriction" section from the ranking, unfortunately Iran remains the world champion of low-quality internet, and the Iranian internet user experience must still be described with three terms: slow[1] (92 of 100), disrupted[2] (92 of 100), and restricted[3] (98 of 100).

If the three priorities and problems of Iran's internet are widespread filtering, weak communications infrastructure, and technology sanctions as has been said many times in the advocacy of the E-Commerce Association then without spending time, with only courageous decision-making and honest action, by lifting filtering and restrictions on social networks and useful websites, and improving network conditions (removing disruptions imposed under the pretext of preventing VPN operation), the user experience of digital businesses and citizens of the country can be significantly improved.

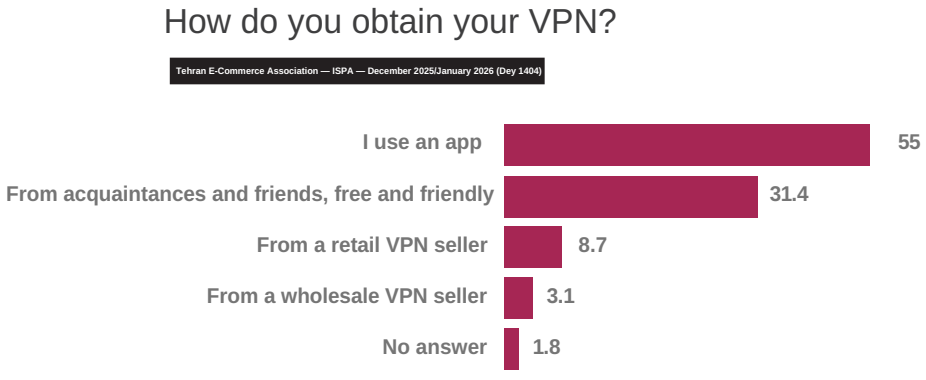
1. Speed: meaning high bandwidth and low latency in loading a website or online content.
2. Disruption: meaning the loss of part of the data in an internet connection, creating a poor experience for users of online services.
3. Censorship: meaning internet domains and IPs being blocked due to censorship or sanctions.



In this report, with the help of the ISPA polling center, we conducted a national and dedicated survey on the extent of VPN use and the details of its use. This report also confirmed the figures of previous reports and stated that 82.4% of users need a VPN to use the internet (the previous report showed that 93.8% of young people under 30 use VPNs).



Also, in a startling statistic, a group of respondents who are parents or have the role of digital parenting of children stated that 30% of these children and teenagers use VPNs.



In practice, the country's filtering policymaker, under the pretext of "protecting Iranian users," unintentionally exposes the most vulnerable Iranian segments to inappropriate content such as pornography, content related to spy recruitment, and so on something that, according to child-protection laws in many countries of the world, is restricted at the platform installation stage (such as Instagram) and by national and union laws (such as the DSA). In Iran, however, with stubborn insistence on continuing filtering, even control at the family level has become impossible!

In this report, in addition to examining the VPN market, for the first time we also analyzed the players and sellers of VPNs in the country.

55% of respondents stated that they use mostly free apps (89.7%); 8.7% use retail VPN sellers (direct contact with a person); and 3.1% use wholesale VPN sellers (anonymous Telegram channels, etc.). In addition to examining these apps, in the next step we conducted field research and interviewed 26 of the largest sellers in this market directly, to investigate the details of this market. The approximate profit of these individuals is close to three times their expenditures, and about 40% of these expenditures go to foreign servers (Hetzner, OVH, Gcore, in that order).

An interesting point that emerged at this stage of our polling was that even among the 40% of respondents who mostly used domestic social networks, 73% used VPNs. This clearly shows that connection to the world is a basic need and cannot be prevented by developing domestic tools.

Do you need a VPN to use the internet?

2-12-1: Use of domestic and foreign social networks

Chart 2-6: Do you check domestic or foreign social networks more?

In this way, performative solutions and special privileges for some citizens (whitelisting SIM cards) stem from a wrong understanding and resemble licensing a basic citizen right and a public need. This means that creating any restriction, command-based protocols, or criminalization in the path of people's basic right produces the opposite result and causes major economic damage and widespread national insecurity; and as long as the demand of the majority of the people is not answered, maximum pressure and restriction is meaningless, ineffective, and harmful. There is no technical solution in the world that can impose unacceptable restrictions on the people against the will of the majority.

During this period, we also witnessed the longest internet shutdown in Iran's history. This bitter period can be divided into three parts:

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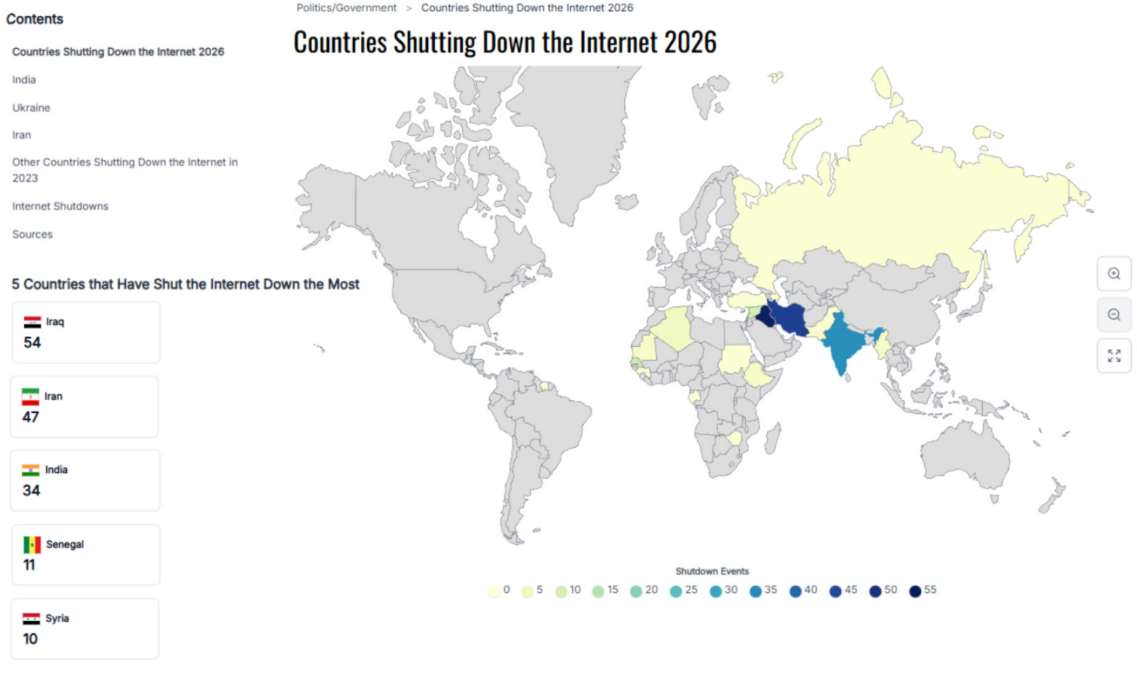
Total Internet Shutdown From January 8 to January 18 (18 to 28 Dey 1404)

During this period, the internet was completely shut down and economic damages and the social crisis reached their highest level. With the addition of this new shutdown period, in the World Bank's most recent update, Iran was placed among the countries with the highest total internet shutdown events in 2026.

Witelist Internet and Limited Access to Some International Sites From January 18 to January 27 (28 Dey to 7 Bahman)

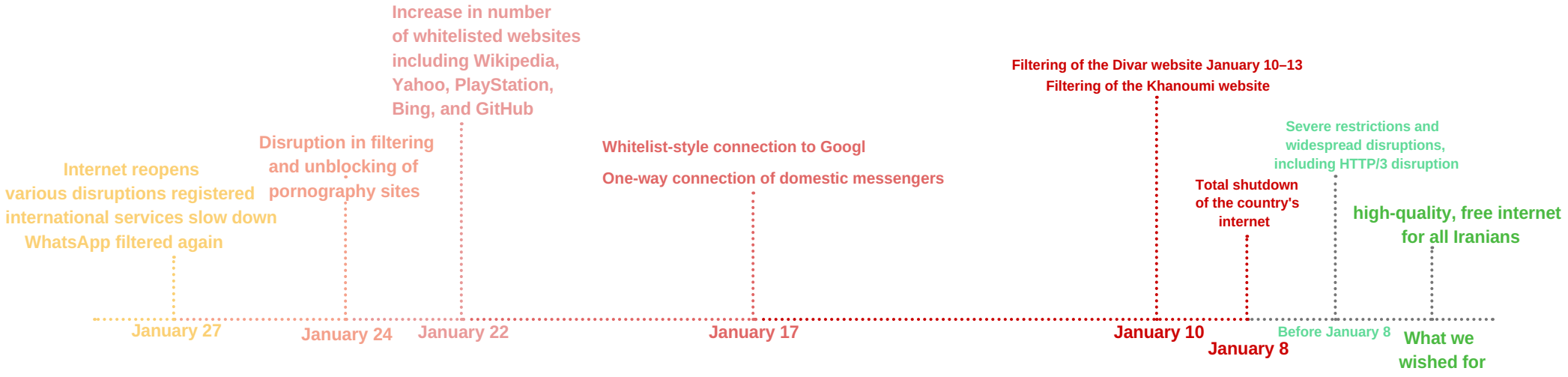
In this period, an attempt was made to test the wrong and costly theory of "whitelist internet." The general idea was that by selectively whitelisting thousands of websites, VPN connections could be permanently blocked. A dangerous idea that was one of the most important reasons for the prolonged internet shutdown.



Internet Connection With Severe Disruption on the Network From January 27 (7 Bahman) to Today

Eventually the internet was reconnected, but under the pretext of fighting VPNs, severe disruptions were once again imposed on the country's network and have persisted. Widespread disruptions paralyze businesses, seriously disrupt daily life, and provoke public anger without creating any disruption to VPN operation.
Some of the most important disruptions that still exist on the network are as follows:

- Frequent TCP Connection Reset errors in normal communications
- Noticeable slowness and severe instability in data exchange between servers inside and outside the country
- Complete unavailability of a number of IP addresses related to shared hosting outside the country, with no possibility of connection
- Connection problems between data centers and shared hosts to Gmail
- Failure of anti-sanction DNSes and disruption in connecting to AI services
- Disruption in access to Docker repositories and programming package repos including Goland, etc.
- Disruption in access to Microsoft services such as OneDrive and Office



As seen in the timeline, an internet shutdown is not a binary on/off matter, or rather not the connection or disconnection of a cable. The government has full control over the internet and can shut down, slow down, or control the internet to any extent and in any form it wants based on its policies. For example, it can shut down the entire internet and unblock a limited number of foreign websites such as Google and this shows that for the costs of shutdown or control, the government does not need domestic hosting or a national information network.

On January 8, 2026 (18 Dey), all banks and important services were shut down, despite being hosted inside the country.

In the first week, all domestic messengers despite extensive government support and being hosted inside the country were shut down. First, Google, GPT, and dozens of international websites and services hosted abroad became accessible, and only after that were restrictions on domestic social networks lifted.

This decision once again showed that hosting inside or outside the country has no technical effect on the implementation of internet sovereignty policies.

The Most Important Positive and Negative Events of the Past Period Related to Internet Quality in Iran

Disclosure of special-treatment internet policies: White SIM cards

22-Day Internet Shutdown

WhatsApp re-filtered after the internet returned in December 2025/January 2026 (Dey 1404)

Successive promises and repeated denials of removing disruptions and filtering

Demands of the E-Commerce Association

In the Sixth Internet Quality Report and our subsequent advocacy activities:

We want to be one of the best countries in the world in the next 25 years; like the countries that move in this historical moment and reach the top. But this future we are drawing this digital future has one root, and that is "free and high-speed internet for all Iranian people."

Unfortunately, Iran's internet has always had one of the worst conditions; an internet that is slow, disrupted, and severely restricted. It is bitter to say we are the champion of low-quality internet. The issue of filtering has a much more terrifying cost than what officials think, and indirectly damages the digital economy by thousands of billions of Toman (translates to billions of US Dollars at 150,000 Toman per USD) and creates obstacles. We are handing over the country's traffic to Israel with both hands, and this is the worst and most anti-security decision that can be made; a decision that can create a large gap between people and the
government a great social rift that will surely show its effect in the future.
What is not a solution?
Class-based internet is not a solution.
Internet in specific areas is not a solution.
A skin/wrapper for YouTube, a wrapper for Telegram is not a solution.
We need free internet for all the people.

- Removing the deliberate disruptions created after the reopening of the internet on January 27, 2026 (7 Bahman 1404), and providing a transparent report to the people explaining this policy.
- Submission of a bill by the government with the aim of registering "the right to internet as a citizenship right of the Iranian people" to the Islamic Consultative Assembly (Parliament), and lobbying for a positive vote of the parliament representatives on the inclusion of this clause in the third chapter of the constitution the "Rights of the Nation" section.
- "Removing the filtering of high-traffic social networks and educational/skill-building websites," "increasing international speed and bandwidth," and "removing restrictions on emerging protocols including HTTP 3.0 and IPv6."

Following its active advocacy in the past year, the E-Commerce Association explained internet quality and the impact of restrictive policies in meetings with "the President, his deputies and some of the cabinet ministers" and "the heads of the three branches of government." A summary of part of this presentation:

Among the Ten Countries with the Worst Internet Quality[4] and the Most Internet Shutdowns!

As stated earlier, in the section on the state of the country's internet before December 2025/January 2026 (Dey 1404), like the previous five reports, we selected internet quality indicators from various reliable databases and used the average state of Iran's internet on each as the basis for the final ranking. In the latency indicator which can in some sense represent parts of disruption we used Google CrUX data; for the restriction indicator, the OONI[5] database; and we measured the speed indicator based on Cloudflare Radar. Finally, we ranked the top 100 GDP countries based on these indicators.

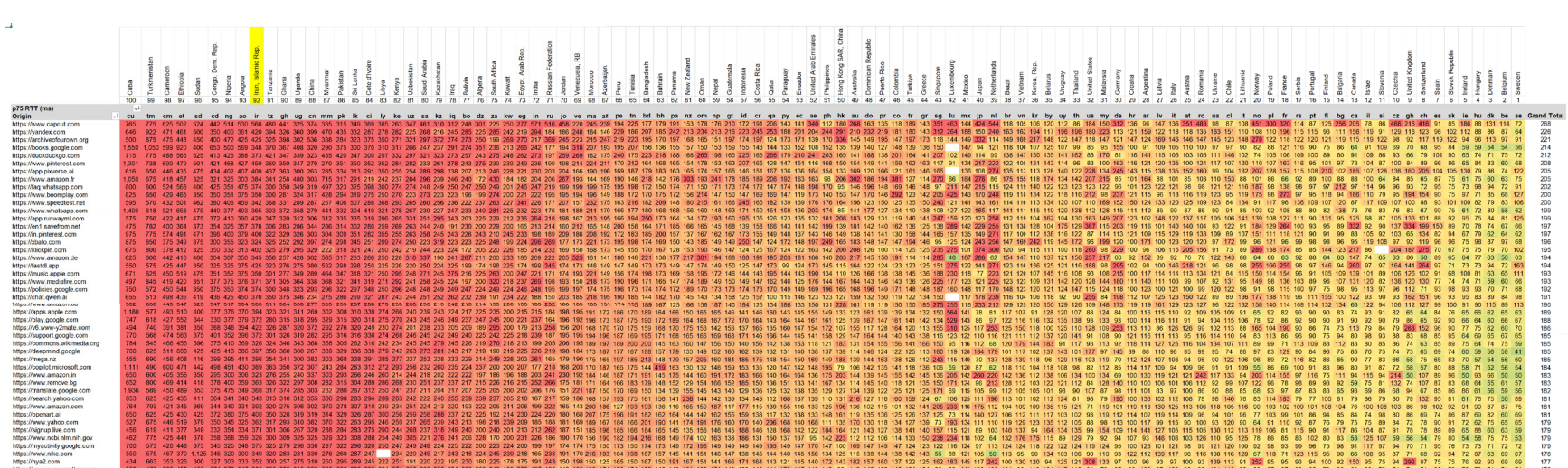
4. In the separate section of each part (disruption, restriction, and speed), we considered the last six-month period (after the publication of the fifth internet report).
5. Open Observatory of Network Interference

Indicator One

Latency Based on Google CrUX Data

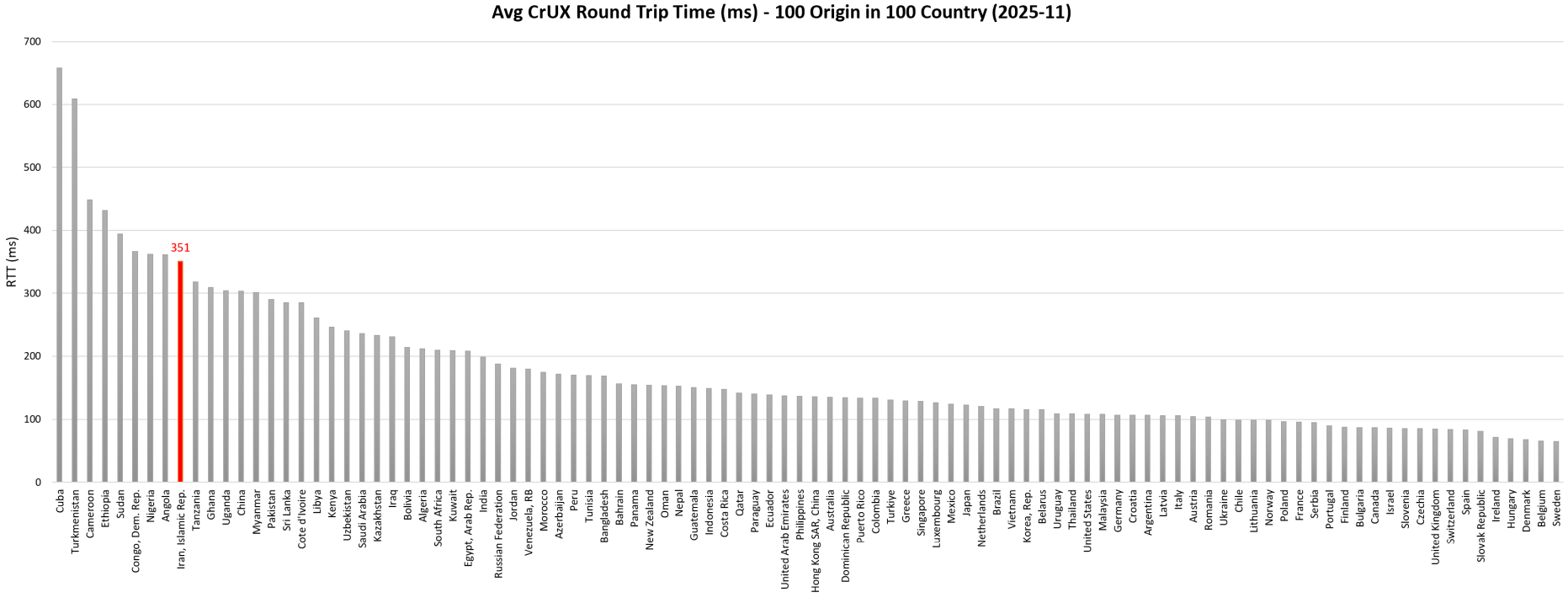
To measure latency, we extracted the Round Trip Time indicator of the top 5,000 Iranian sites in November 2025 from the CrUX report. We removed filtered sites and sites that have sanctioned Iranian users from the report; then we separated the sites that had information in all countries during this period. This way we arrived at 117 sites. From among these sites, the 100 sites with the higher ranking were selected, and the RTT status of the sites in different countries was evaluated. Finally, the final ranking was applied based on the RTT indicator of the sites. The reason for using the RTT indicator for ranking countries is the removal of the Effective Connection Type indicator by Google CrUX from the beginning of 2025. Therefore, RTT is a more accurate indicator for ranking countries in internet quality.

In total, RTT alone cannot be a complete representative of disruption in the internet, because it does not include factors such as Packet Loss and Jitter. However, since important indicators such as routing disruption, problems in TCP Handshake, and even Packet Loss can cause an increase in RTT and given that this indicator is verifiable and comparable for us RTT can be considered a suitable representative for measuring disruption.



The above chart shows the ranking as a heatmap of access to the popular websites examined.

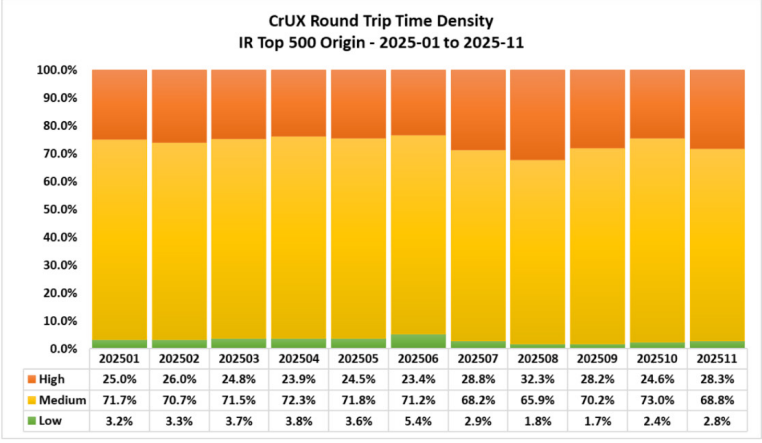
The state of Iran's internet quality based on the RTT indicator from access to popular sites based on Google's database, compared to the top 100 GDP countries, from the beginning of 2018 to November 2025.



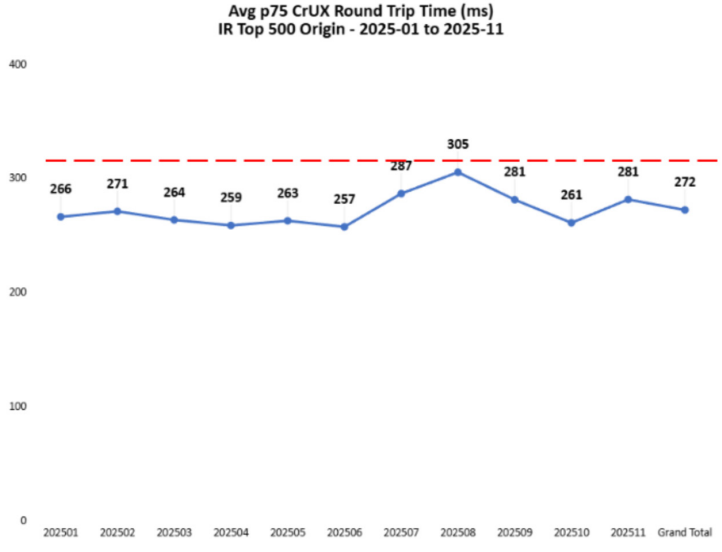
State of Iran's internet quality based on the RTT indicator from Google's database compared to the top 100 GDP countries in November 2025

This chart also shows Iran's position in the RTT indicator compared to the countries of the world, showing that Iran has a better situation than only eight countries: Angola, Nigeria, Congo, Sudan, Egypt, Ethiopia, Cameroon, Turkmenistan, and Cuba. If we want to show this situation in another way, we can see in the chart below the period from January 2025 to November 2025. As can be seen, only about 3% of popular Iranian websites are in good condition with Low status in the RTT indicator. 70% of websites are in Medium status, and 26% are in High or very bad status.

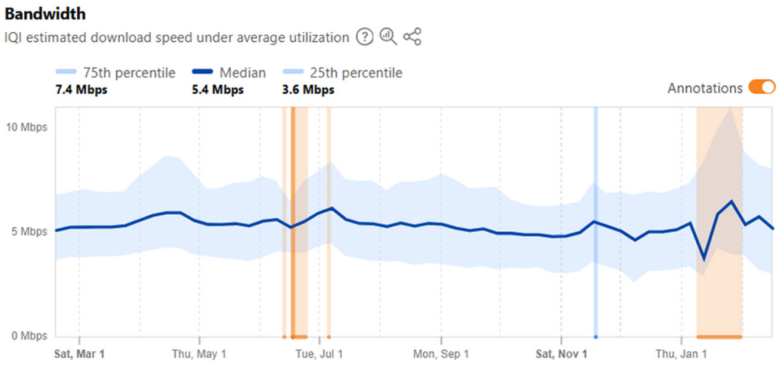
Low (0 ms - 75 ms)
Medium (75 ms - 275 ms)
High (> 275 ms)



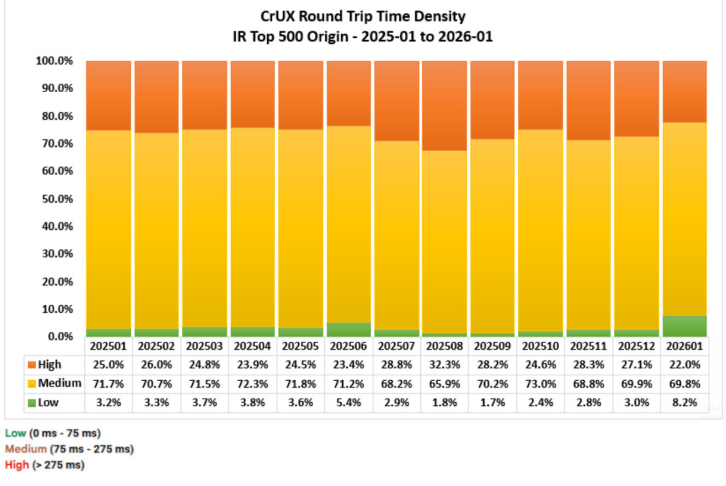
	202501	202502	202503	202504	202505	202506	202507	202508	202509	202510	202511
High	25.0%	26.0%	24.8%	23.9%	24.5%	23.4%	28.8%	32.3%	28.2%	24.6%	28.3%
Medium	71.7%	70.7%	71.5%	72.3%	71.8%	71.2%	68.2%	65.9%	70.2%	73.0%	68.8%
Low	3.2%	3.3%	3.7%	3.8%	3.6%	5.4%	2.9%	1.8%	1.7%	2.4%	2.8%



If we want to examine Iran's situation over the last 6 months, we will see that from July 2025 to December 2025 (Tir 1404 to Azar 1404) the period during which this examination was conducted the state of internet quality in the month after the internet shutdown (summer 2025/Summer 1404) saw the RTT state of Iran's internet reach its worst level in the 11 months of 2025:



An interesting point that can be seen from examining the traffic of the last 12 months is the positive changes including an increase in Iran's average internet speed during the period of internet shutdown. Precisely when Iran's internet was shut down and only 4% of users had access to the internet, the average speed of Iran's internet reached its highest level in the past 12 months, at 11 Mbps.



CrUX data also confirms this issue. In the month in which 22 days saw internet shutdown and only a specific class had access to the internet, the Low RTT group jumped more than two-fold to 8%.

One technical reason for this is "reduction of operator traffic load at the access layer", which causes the network to operate at higher quality without saturation. This issue, which has been raised many times as one of the three main pillars of internet quality in Iran, emphasizes the necessity of improving the Access network.

In any case, with this data, we may discover the bitter truth that the minority or rather "the country's privileged class" has had access to faster, unfiltered internet, and when the country's infrastructure highway is fully placed at their disposal, they also enjoy lower latency.

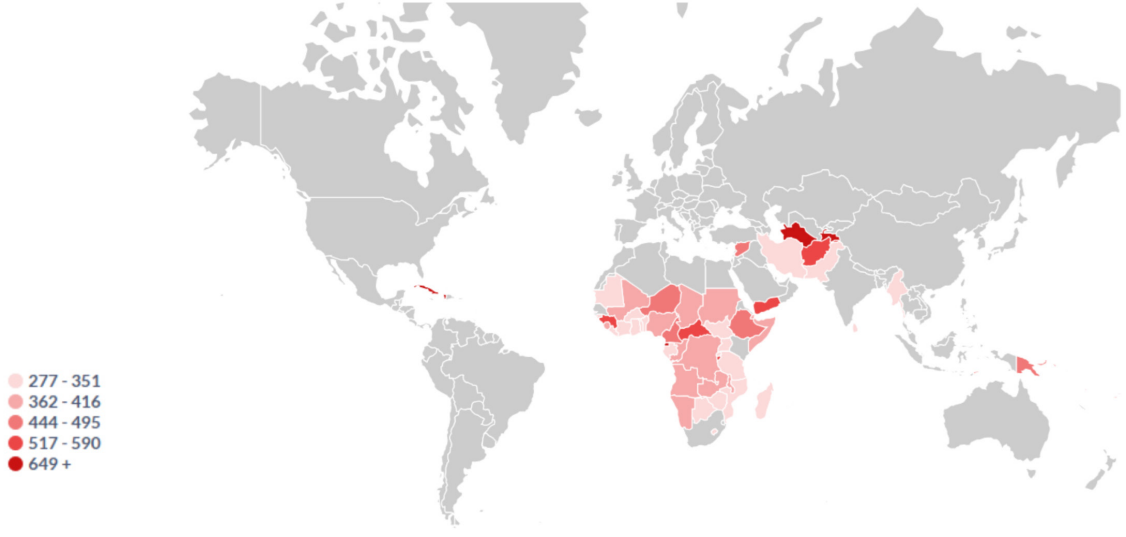
As is our tradition, we also compared the RTT indicator of one of the popular Iranian websites with a similar site in one of the neighboring countries. The percentages indicate the quality of online user experience, where Iranians experience a worse situation on all compared platforms compared to citizens of neighboring countries:

Third Report **Spring 2024** **(Bahar 1403)**	YouTube **97%**	Aparat **77%**
Fourth Report **Winter 2024/2025** **(Zemestan 1403)**	Careem **92%** Trendyol **97%**	Snapp/Tapsi **77%** Digikala **81%**
Fifth Report **Summer 2025** **(Tabestan 1404)**	OpenSooq **94%** Haraj **93%**	Divar **80%**
Sixth Report **Winter 2025/2026** **(Zemestan 1404)**	Obilet **97%**	Alibaba **240**

The recorded user experience reflects the state affected by the country's internet quality, and its responsibility does not lie with the platform providing the service!

In this report, with RTT as the criterion, we compared the user experience of popular online travel platforms in Iran, Turkey, and Qatar. Our investigations show that Alibaba's Round Trip Time experience from Iran is 240, while the Qatari sample qatarairways is at 165, and obilet in Turkey is at 163. As stated above, a higher number on this user experience indicator means slower page loading and reduced user e xperience quality:

RTT Says Iranian User Experience Is Similar to Underdeveloped Countries!



Previously, in the average internet quality section, the Round Trip Time indicator was examined among 300,000 frequent Origins among different countries, and we arrived at the overall average of countries. This indicator measures the average time it takes for a request to reach the destination from the user and return. This way, it examines the quality of user experience based on speed.

This time, to know the state of this indicator among domestic Origins, we extracted information on the top 1,000 frequent Origins of each country in June. The result was that Iran ranked at an average of 272 milliseconds on the RTT indicator.

شاخص	واحد	تفکیک		سه ماهه دوم ۱۴۰۴
متوسط زمان رفت و برگشت بسته (RTT)	میلی ثانیه	ثابت	داخلی	۱۹/۸۶
			بین الملل	۷۶/۱
		سیار	داخلی	۳۵/۶۵
			بین الملل	۹۵/۸۶
متوسط نرخ تاخیر متغیر ارسال و دریافت بسته (Jitter)	میلی ثانیه	ثابت	داخلی	۱/۰۶
			بین الملل	۱/۳۴
		سیار	داخلی	۶/۹۹
			بین الملل	۸/۹۱

In summer 2025 (Tabestan 1404), the Communications Regulatory Authority announced network quality indicators based on RTT in a report.

Since we welcome any kind of methodical and accurate statement and reporting from the policymaker, the section on internet quality indicators based on this report is presented in this section.

The numerical difference of these indicators with the indicators calculated in the existing report which is based on Google CrUX is due to methodology and calculation methods. We used the CrUX report numbers not as an absolute number, but as a comparative indicator between Iran and other countries, and also independently regarding Iran in different months.

6. https://iranfttx.ir

Country	Censored–%	Total Domain	Final Rank
China	58%	100	100
Myanmar	50%	10	99
Iran, Islamic Rep.	39%	100	98
Russian Federation	21%	100	97
Pakistan	8%	100	96
Tanzania	8%	100	95
Belarus	7%	100	94
...			
Ireland	0%	66	5
Hungary	0%	100	4
Denmark	0%	100	3
Belgium	0%	100	2
Sweden	0%	100	1

Indicator Two

From Summer 2025 to Before the Winter 2025/2026 Shutdown

Adding Censorship and Filtering Based on OONI: Position 98 of 100 Countries

After analyzing CrUX data, we also added OONI data to our comparison, so that we could include the restriction variable in the final ranking, in addition to disruptions. China and then Myanmar, with the highest filtered domain rate, are at the top of this table, and Iran is in third place. That is, Iran, with 39% censorship of content in the domains examined, is in position 98 of 100 countries after Iran, Russia, Pakistan, and Tanzania. The improvement in Iran's position in this report compared to the previous report (position of second most restricted internet in the world) does not mean an improvement in the situation of censored Iranian websites. According to the OONI report, compared to the past six months, the situation of restricted websites has worsened by 3%. Of the 100 countries examined, 20 countries had no statistical sample in the restriction section. Also, of these, 75 countries had no filtered websites from this 100-countr statistical sample.

Country	Speed – Rank
Cuba	100
Turkmenistan	99
Cameroon	98
Ethiopia	97
Sudan	96
Congo, Dem. Rep.	95
Nigeria	94
Angola	93
Iran, Islamic Rep.	92
Tanzania	91
Ghana	90
Saudi Arabia	80
Kazakhstan	79
Iraq	78
Bolivia	77
Argentina	28
..	...
Denmark	3
Belgium	2
Sweden	1

Indicator Three

From Summer 2025 to Before the Winter 2025/2026 Shutdown

Examination of Speed Based on CloudFlare Radar: Position 92 of 100 Countries

Regarding the speed status, we used the bandwidth, latency, and DNS response time indicators as criteria. Iran's internet bandwidth in the Bandwidth indicator shows an average of 5.4 Mb/s, while the average of this indicator in Asia is 13 mb/s. In the DNS Response Time indicator, Iran's average is 141 ms, and Iran's latency indicator is 136 ms, while the average of this indicator in Asia is 86 ms. In total, Iran is in position 92 among the top 100 GDP countries:

	crUX	OONI			Ranking				
Country	AVG RTT (ms)	Distrubed-٪	Censored-٪	Total Domain	Speed-Rank	Distrubed-Rank	Censored-Rank	Total (Avg)	Final Rank
Cuba	658	0%	0%	0	100	100		100	100
Turkmenistan	609	0%	0%	0	99	99		99	99
Sudan	394	0%	0%	3	96	96		96	98
Congo, Dem. Rep.	367	0%	0%	4	95	95		95	97
Iran, Islamic Rep.	351	3%	39%	100	92	92	98	94	96
Angola	361	0%	0%	0	93	93		93	95
Tanzania	318	4%	8%	100	91	91	95	92	94
China	303	5%	58%	100	88	88	100	92	93
Myanmar	301	10%	50%	10	87	87	99	91	92
Pakistan	291	4%	8%	100	86	86	96	89	91
....									
Ireland	71	2%	0%	66	5	5	1	4	5
Hungary	69	1%	0%	100	4	4	1	3	4
Denmark	68	1%	0%	100	3	3	1	2	3
Belgium	65	0%	0%	100	2	2	1	2	2
Sweden	64	1%	0%	100	1	1	1	1	1

The state of Iran's internet quality across indicators of restriction (OONI database), disruption (Google CrUX database), and speed (Cloudflare database)

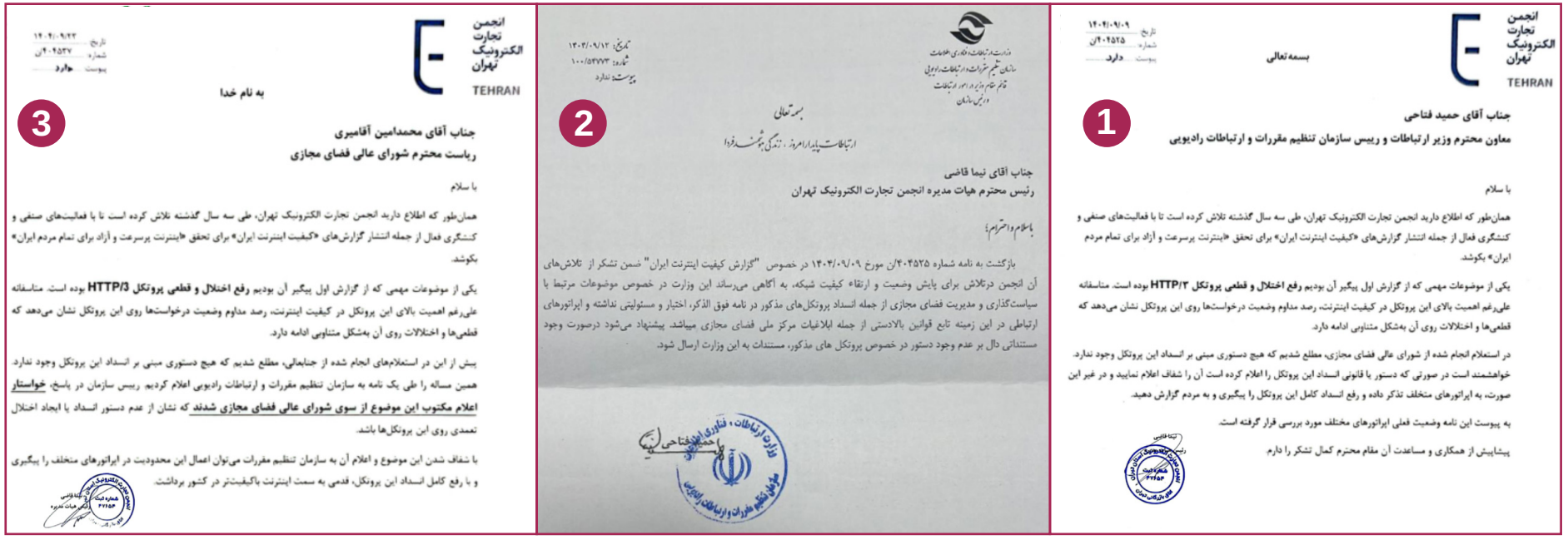
Final Ranking: Worst Quality Among the Top 100 GDP Countries

From Summer 2025 to Before the Winter 2025/2026 Shutdown

Thus, after removing countries that did not have the threshold domain for evaluation, Iran has the worst internet quality among the top 100 GDP countries based on CrUX data, the OONI statistical database, and Cloudflare.

The Vicious Circle of the Policymaker's Deflection in Accepting Responsibility for Internet Restrictions!

In the days when, optimistically, we did not predict a long-term internet shutdown as one of the country's internet risks, we had warned about the disruption to HTTP/3 protocols and stated through documents that the result of our tests on this protocol broken down by provider showed severe disruption of this protocol. However, as is clear in the letters below, after the Secretary of the Supreme Council of Cyberspace verbally announced that there is no order for disruption or prohibition of this protocol, we communicated the matter in writing to the Deputy Minister of Communications and the Head of the Communications Regulatory Authority. They officially attributed it to the Supreme Council of Cyberspace and considered it based on the order of this council. After receiving this letter, we sent the response as an attachment to a letter to the Supreme Council of Cyberspace and demanded action on this issue, but to date this letter has remained unanswered.



1

انجمن تجارت الکترونیک تهران
TEHRAN

بسمه تعالی

جناب آقای حمید فتاحی
معاون محترم وزیر ارتباطات و رییس سازمان تنظیم مقررات و ارتباطات رادیویی

با سلام

همان‌طور که اطلاع دارید انجمن تجارت الکترونیک تهران، طی سه سال گذشته تلاش کرده است تا با فعالیت‌های صنفی و کنشگری فعال از جمله انتشار گزارش‌های «کیفیت اینترنت ایران» برای تحقق «اینترنت پرسرعت و آزاد برای تمام مردم ایران» بکوشد.

یکی از موضوعات مهمی که از گزارش اول پیگیر آن بودیم **رفع اختلال و قطعی پروتکل HTTP/۳** بوده است. متاسفانه علی‌رغم اهمیت بالای این پروتکل در کیفیت اینترنت، رصد مداوم وضعیت درخواست‌ها روی این پروتکل نشان می‌دهد که قطعی‌ها و اختلالات روی آن به‌شکل متناوبی ادامه دارد.

در استعلام انجام شده از شورای عالی فضای مجازی، مطلع شدیم که هیچ دستوری مبنی بر انسداد این پروتکل وجود ندارد. خواهشمند است در صورتی که دستور یا قانونی انسداد این پروتکل را اعلام کرده است آن را شفاف اعلام نمایید و در غیر این صورت، به اپراتورهای متخلف تذکر داده و رفع انسداد کامل این پروتکل را پیگیری و به مردم گزارش دهید.

به پیوست این نامه وضعیت فعلی اپراتورهای مختلف مورد بررسی قرار گرفته است.

پیشاپیش از همکاری و مساعدت آن مقام محترم کمال تشکر را دارم.

2

وزارت ارتباطات و فناوری اطلاعات
سازمان تنظیم مقررات و ارتباطات رادیویی
قائم مقام وزیر و رییس سازمان

بسمه تعالی

ارتباطات پایدار امروز، زندگی بهتر فردا

جناب آقای نیما قاضی
رئیس محترم هیات مدیره انجمن تجارت الکترونیک تهران

باسلام و احترام؛

بازگشت به نامه شماره ۴۰۴۵۲۵/ن مورخ ۱۴۰۴/۰۹/۰۹ در خصوص "گزارش کیفیت اینترنت ایران" ضمن تشکر از تلاش‌های آن انجمن درتلاش برای پایش وضعیت و ارتقاء کیفیت شبکه، به آگاهی می‌رساند این وزارت در خصوص موضوعات مرتبط با سیاست‌گذاری و مدیریت فضای مجازی از جمله انسداد پروتکل‌های مذکور در نامه فوق الذکر، اختیار و مسئولیتی نداشته و اپراتورهای ارتباطی در این زمینه تابع قوانین بالادستی از جمله ابلاغیات مرکز ملی فضای مجازی میباشد. پیشنهاد می‌شود درصورت وجود مستنداتی دال بر عدم وجود دستور در خصوص پروتکل های مذکور، مستندات به این وزارت ارسال شود.

3

انجمن تجارت الکترونیک تهران
TEHRAN

به نام خدا

جناب آقای محمدامین آقامیری
ریاست محترم شورای عالی فضای مجازی

با سلام

همان‌طور که اطلاع دارید انجمن تجارت الکترونیک تهران، طی سه سال گذشته تلاش کرده است تا با فعالیت‌های صنفی و کنشگری فعال از جمله انتشار گزارش‌های «کیفیت اینترنت ایران» برای تحقق «اینترنت پرسرعت و آزاد برای تمام مردم ایران» بکوشد.

یکی از موضوعات مهمی که از گزارش اول پیگیر آن بودیم **رفع اختلال و قطعی پروتکل HTTP/3** بوده است. متاسفانه علی‌رغم اهمیت بالای این پروتکل در کیفیت اینترنت، رصد مداوم وضعیت درخواست‌ها روی این پروتکل نشان می‌دهد که قطعی‌ها و اختلالات روی آن به‌شکل متناوبی ادامه دارد.

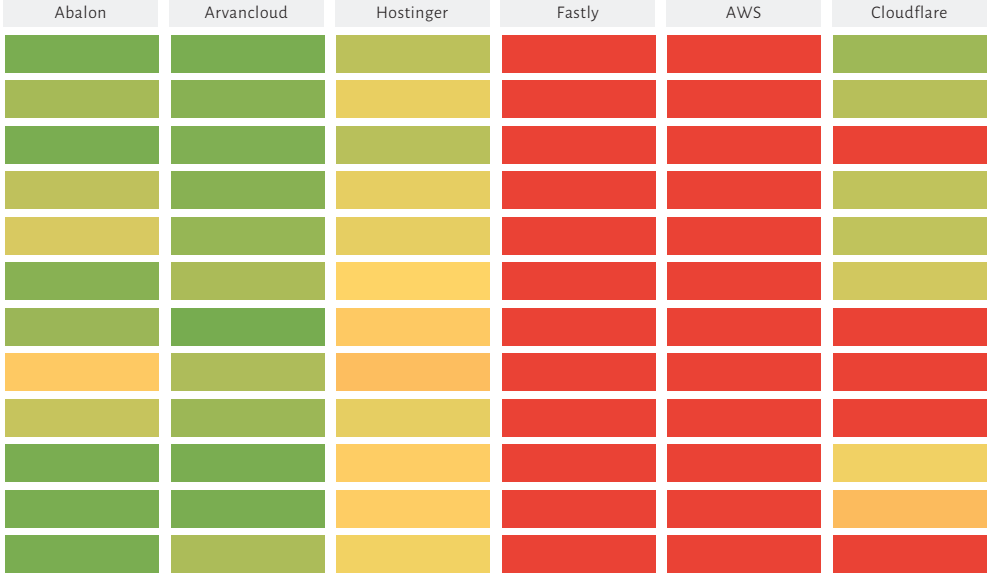
پیش از این در استعلام‌های انجام شده از جنابعالی، مطلع شدیم که هیچ دستوری مبنی بر انسداد این پروتکل وجود ندارد. همین مساله را طی یک نامه به سازمان تنظیم مقررات و ارتباطات رادیویی اعلام کردیم. رییس سازمان در پاسخ، **خواستار اعلام مکتوب این موضوع از سوی شورای عالی فضای مجازی شدند** که نشان از عدم دستور انسداد یا ایجاد اختلال تعمدی روی این پروتکل‌ها باشد.

با شفاف شدن این موضوع و اعلام آن به سازمان تنظیم مقررات می‌توان اعمال این محدودیت در اپراتورهای متخلف را پیگیری و با رفع کامل انسداد این پروتکل، قدمی به سمت اینترنت باکیفیت‌تر در کشور برداشت.

Unfortunately, most letters, requests, and written suggestions of the E-Commerce Association to the Supreme Council of Cyberspace have remained unanswered.

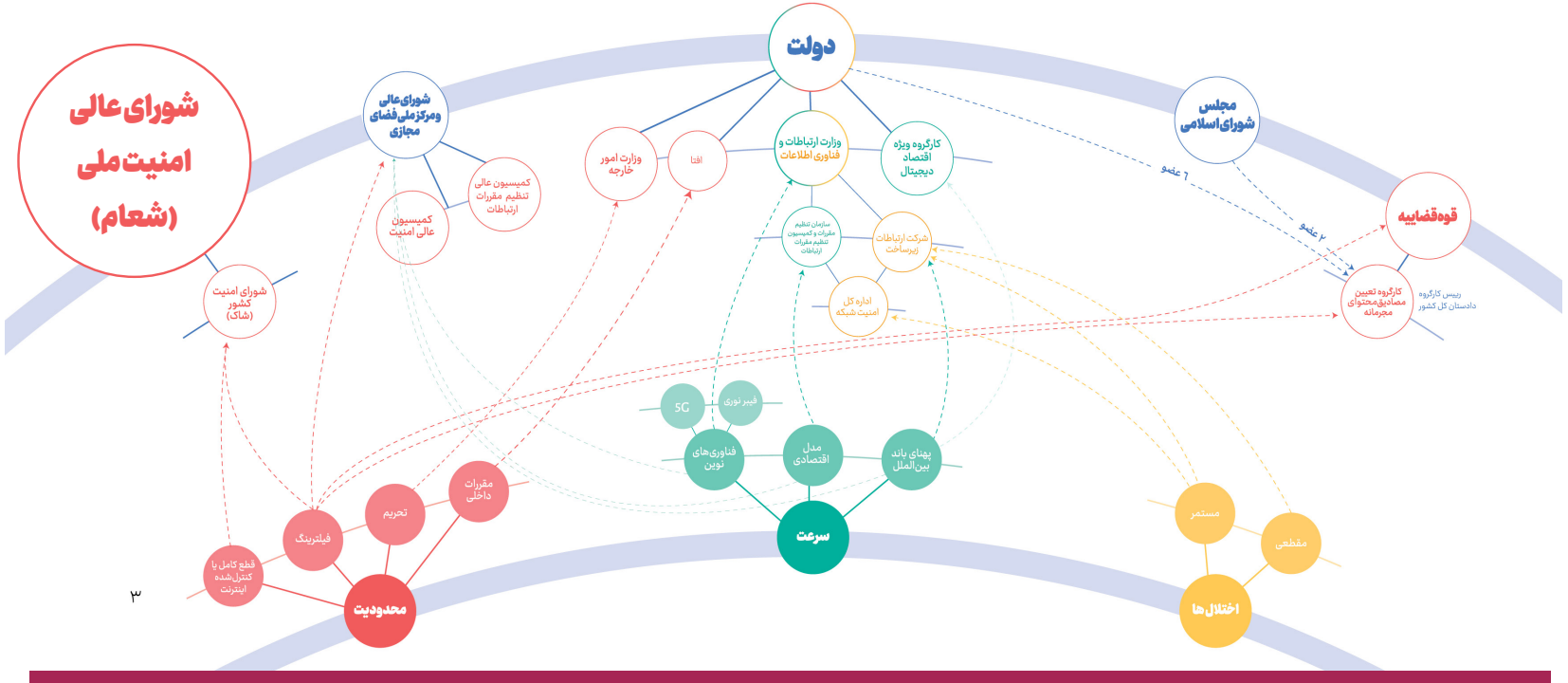
The content of the first letter is an examination of the state of intermittent disruption and outage of various providers on the HTTP/3 protocol, which shows that on all providers (Afranet, Amin, Asiatech, Bertina, HostIran, Irancell, Hamrah-e-Aval, Mahan-Net, Pishgaman, Shatel, Mokhaberat, and Zitel) on AWS and Fastly, complete shutdown is recorded. Also, requests to Cloudflare from Asiatech, Hamrah-e-Aval, Pishgaman, and Zitel show complete shutdown.

In the test conducted, the state of intermittent disruption and outage of various providers on the HTTP/3 protocol was examined. On each provider, five tests were conducted at 10-second intervals, and if all five attempts were unsuccessful, it was recorded as an unsuccessful result/total disconnection (in red). This examination was conducted on days other than the widespread global Cloudflare disruption (November 18, 2025 / 27 Aban 1404). As can be seen, all providers (Afranet, Amin, Asiatech, Bertina, HostIran, Irancell, Hamrah-e-Aval, Mahan-Net, Pishgaman, Shatel, Mokhaberat, and Zitel) on AWS and Fastly recorded complete outage. Also, requests to Cloudflare from Asiatech, Hamrah-e-Aval, Pishgaman, and Zitel show complete outage. For more accurate examination, the average request latency (in milliseconds) and broken down by each provider is given in another table.



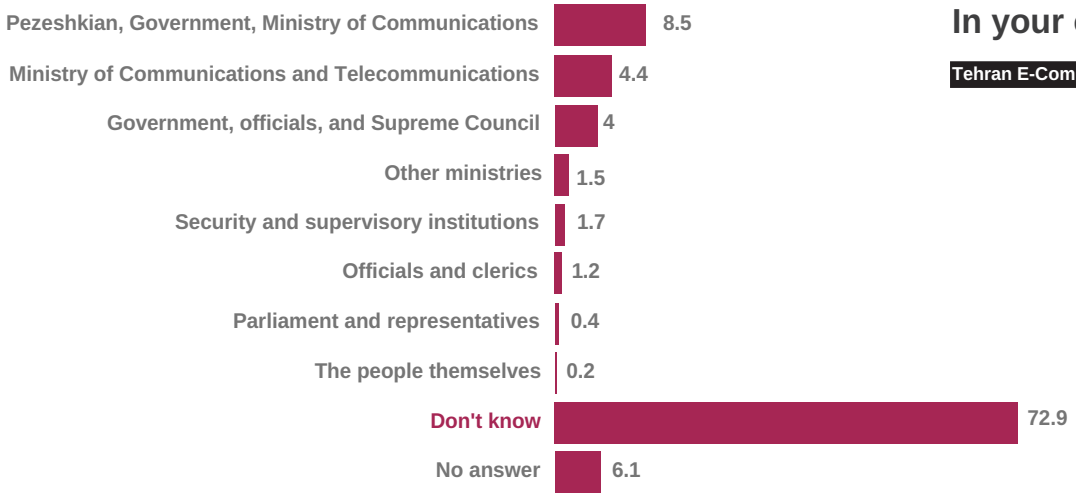
Who Should Be Accountable for Internet Quality?

Previously, we have presented several methods for transparency on those responsible for internet outages and restrictions; such as the image below in which we explained the role of each governing body broken down by their scope of influence; such as the statement that the President with the power of chairing the Supreme National Security Council, chairing the Supreme Council of Cyberspace, the power to appoint the Secretary of the Supreme Council of Cyberspace, the appointment of 6 of the 12 members of the Working Group for Determining Criminal Instances, etc. has the most authority and control to improve internet quality in the country and must be accountable in this regard more than any other person. But in practice, it has been seen that the government, despite spending billions of the country's budget, cannot even stand alongside the people as a position-taker:



Only a few days after the nationwide internet shutdown, representatives of the private sector including representatives of the E-Commerce Association met with the President and informed him of part of the disaster that occurred due to the nationwide shutdown. In the same meeting, the President ordered the reconnection of the internet.

The afternoon of the same day (January 18, 2026 / 28 Dey 1404), the President also stated in the Council of Ministers meeting: "I advised Mr. Larijani that the internet restrictions should be lifted as soon as possible." Advice or an order that took at least 10 days to be implemented.



In your opinion, who is responsible for filtering in the country?

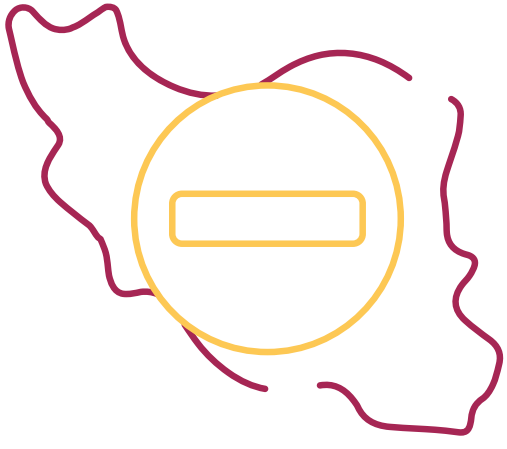
Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)

Regardless of how the two Supreme Councils of Cyberspace and National Security make decisions about internet shutdowns and widespread filtering and with what division of votes from the people's perspective, the government is the main authority responsible for such decisions.

Special Truth-Finding File:

In the Past Ten Years, Which Government and Non-Government Officials Have Lent Legitimacy to Internet Restriction with a Public Statement?

This time, with another method, we examined all the statements of the country's policymakers regarding internet shutdowns and restrictions in the form of a special file. In the table below, we recount any statement that in the past 10 years, in any way, gave legitimacy to the country's restriction-creating internet policy:



It is difficult to find a common point among all these statements because many of them are ambiguous and unclear, and more importantly, many of the members of the Supreme Council had no official statement on the issue. However, the result of statements by some members of the Supreme Council of Cyberspace can be categorized as follows:

For Filtering		Against Filtering	
Strongly For Filtering	Moderately For Filtering	Moderately Against Filtering	Strongly Against Filtering

Another important point in this regard is the support for class-based internet among these individuals. After repeatedly reviewing the positions of these individuals on filtering and the internet, the conclusion can be drawn that "lack of clarity exists abundantly among both supporting and opposing groups, making categorization difficult. For example, the government has ministers who do not explicitly oppose filtering, and therefore one cannot see a unified position among all ministers about the government, but about the Minister of Intelligence, one can clearly say that he supports filtering. The table below shows a summary of four types of behavior of the Supreme Council of Cyberspace members regarding the issue of internet filtering. What is clear is the difference of opinions in the decision-making layer on the vital issue of the internet:

Political Alignment of the Supreme Council of Cyberspace in Confronting Filtering

Showing the balance of power and categorization of the views of the members of the Supreme Council of Cyberspace regarding filtering restrictions

Supporters of Filtering

56.5% 13 people

Opponents of Filtering

43.5% 10 people

Strongly For Filtering	Moderately For Filtering	Moderately Against Filtering	Strongly Against Filtering
Mohammad-Amin Aghamiri	Gholam-Hossein Mohseni-Eje'i	Mohammad-Bagher Ghalibaf	Masoud Pezeshkian
Kamyar Saghafi	Mohammad Qomi	Alireza Kazemi	Sattar Hashemi
Esmail Khatib		Ezzatollah Zarghami	Seyyed Abbas Salehi
Mohammad-Jafar Montazeri		Mehdi Akhavan-Behabadi	Hossein Afshin
Morteza Aqa-Tehrani		Hossein Simaei-Sarraf	Saeedreza Ameli
Mohammad Movahedi-Azad			
Hamid Shahriari			
Ahmad-Reza Radan			
Rasoul Jalili			
Peyman Jebelli			
Reza Taghipour			

#	Name	Position / Main Role	Main Category	Details / Additional Label	Summary of Key Position from Source
1	Masoud Pezeshkian	President (Council Chair)	Strongly against filtering	—	Reopening platforms, sharp criticism of filtering and VPN-selling
2	Mohammad-Bagher Ghalibaf	Speaker of Parliament	Moderately against filtering	Emphasis on governance	Against current filtering, but for governance and gradual lifting
3	Gholam-Hossein Mohseni-Eje'i	Head of Judiciary	Moderately for filtering	For shutdown in security conditions	Against complete blocking, strengthen domestic, history of ultimatum for filtering
4	Mohammad-Amin Aghamiri	Secretary of Supreme Council of Cyberspace	Strongly for filtering	—	Defense of internet shutdown for security, secrecy of resolutions
5	Mohammad-Jafar Montazeri	Head of Supreme Court	Strongly for filtering	—	Blames internet for unrest, prefers security over economic damage
6	Mohammad Movahedi-Azad	Prosecutor General	Strongly for filtering	—	Lifting filter conditional on strengthening domestic
7	Sattr Hashemi	Minister of Communications and IT	Strongly against filtering	—	Serious pursuit of lifting filtering, current state not in good interest
8	Seyyed Abbas Salehi	Minister of Culture and Islamic Guidance	Strongly against filtering	—	Government view of removing restrictions
9	Alireza Kazemi	Minister of Education	Moderately against filtering	—	Against final filtering in all cases
10	Hossein Afshin	VP for Science, Technology and Knowledge-based Economy	Strongly against filtering	Defender of class-based internet	Promise of return to normal, class-based internet for companies
11	Ahmad-Reza Radan	Commander of Police Force	Strongly for filtering	—	Enemy is besieging in cyberspace
12	Peyman Jebelli	Head of IRIB (State TV)	Strongly for filtering	—	Filtering/gatekeeping is necessary in all countries
13	Mohammad Qomi	Head of Islamic Propaganda Organization	Moderately for filtering	Emphasis on governance	Adherence to 32-clause resolution, not unregulated lifting
14	Esmail Khatib	Minister of Intelligence	Strongly for filtering	—	Filtering plays a role in security
15	Hossein Simaei-Sarraf	Minister of Science, Research, and Technology	Moderately against filtering	Defender of class-based internet	Pursuit of lifting for academics/YouTube
16	Morteza Aqa-Tehrani	Head of Cultural Commission of Parliament	Strongly for filtering	Emphasis on governance	Internet causes corruption, defense of "Siyanat" and criminalization
17	Ezzatollah Zarghami	Real member	Moderately against filtering	Emphasis on governance	Against blocking foreign without strengthening domestic
18	Mehdi Akhavan-Behabadi	Real member (CEO of Hamrah-e-Aval)	Moderately against filtering	Emphasis on economic dimension	Filtering is a lose-lose game, harm to quality and security
19	Hamid Shahriari	Real member	Strongly for filtering	Defender of class-based internet	Differentiation of access based on expertise
20	Rasoul Jalili	Real member	Strongly for filtering	Emphasis on governance	Priority of security, financial penalty for VPN-sellers, reconsidering foreign platforms
21	Kamyar Saghafi	Real member	Strongly for filtering	—	Cyberspace as a tool of the enemy when free
22	Saeedreza Ameli	Real member	Strongly against filtering	—	Filtering platforms is wrong, data management needed but no sovereignty over the internet
23	Reza Taghipour	Real member	Strongly for filtering	Emphasis on governance	Internet needs Iranian/Chinese standards, criminalization of VPN use

Special Instagram File:

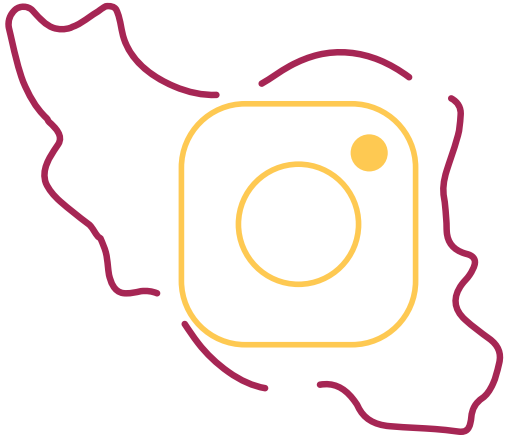
The Largest Online Buying and Selling Site in Iran Is Filtered

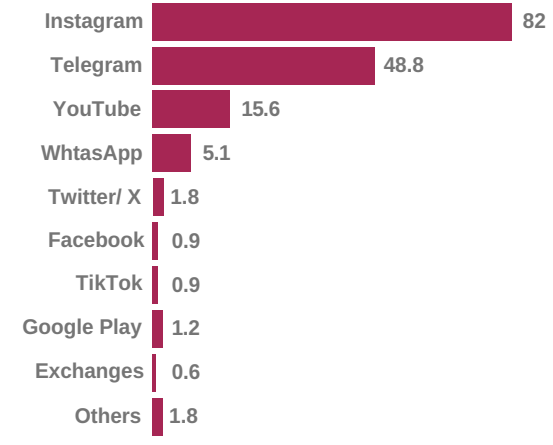
Instagram: From Social Network to Economic Infrastructure

In Iran today, Instagram is no longer just a social network for entertainment and passing time. For millions of people, this platform has become the main infrastructure of small retail, home employment, and daily income. From clothing and handicrafts sales to educational services and home businesses, Instagram plays a role that in many countries is the responsibility of official e-commerce platforms.

This transformation has occurred while access to Instagram in Iran has been officially blocked since September 2022. Despite this, data shows that filtering has not been able to eliminate the economic role of this platform and has only intensified the use of VPNs.

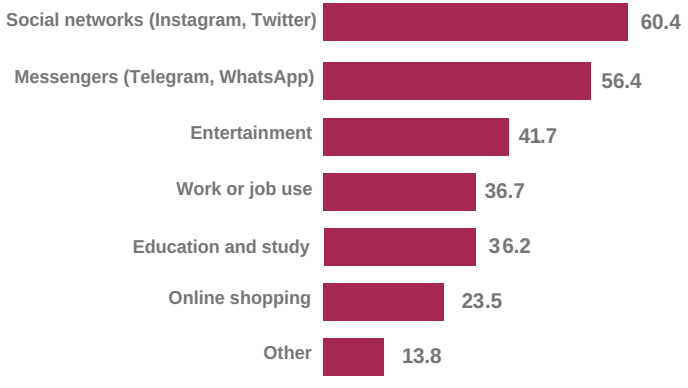
In an exclusive review by the E-Commerce Association with the help of ISPA, the use of social networks shows 60.4% of users' goals for connection, and from among all social networks, Instagram with 82% is users' first choice for unblocking and the first choice of 55% of users.





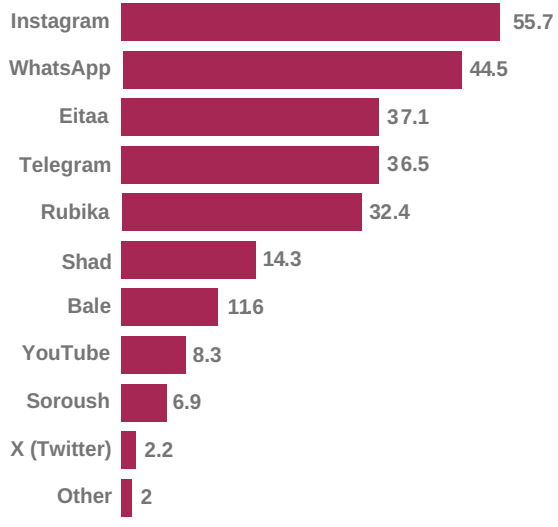
So that you don't have to use a VPN, the restrictions on which programs or apps you use should be lifted?

Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)



What do you mostly use the internet for?

Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)



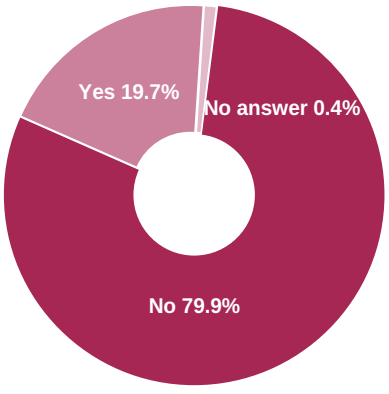
Which platform/social network do you check most daily?

Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)

The Real Scale of Commerce on Instagram

Estimates from the Padro platform — one of the largest providers of infrastructure services for Instagram commerce in Iran — provide an unprecedented picture of the dimensions of this market. According to the data and statements by the CEO of this company, in 2024 about 700,000 active stores on Instagram have been identified, and the annual financial turnover of this ecosystem is estimated in the range of 70-80 thousand billion Toman (approximately $467-533 million USD at 150,000 Toman per USD)[1].

To understand the importance of this number, it is enough to compare it with the official statistics of Digikala. According to the annual report of this company, Digikala had about 418,000 active sellers in 2023[2]. Even taking into account the difference between an official seller and an informal business, the difference in scale is significant.



Do you earn income through cyberspace?

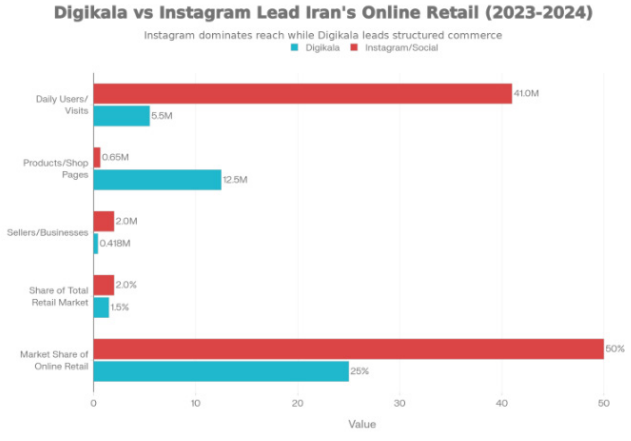
Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)

User Penetration:
Where Does Instagram Stand in Society?

Data from the Iran Students Polling Center (ISPA) shows that Instagram is one of the most pervasive media in the country. In the latest surveys of 2024, about 50 to 56% of the population over 18 years old in Iran stated that they use Instagram[3].

These findings are also consistent with estimates based on analysis of Meta advertising tools data. Although Meta does not officially publish analytical statistics for various countries, an independent analysis of public data from Instagram Ads & Audience Tools shows that the number of Iranian users of this platform is in the range of 45 to 47 million[4].

Demographically, Instagram's penetration is even higher among the key groups of the digital economy: more than 85% of university students use it daily, and about 76% of users are in the 18 to 29 age group[3].



Instagram's Position vs Digikala

According to Digikala's annual report (citing ISPA data), online retail sales in Iran are roughly equally divided between two sectors: official e-commerce and e-commerce based on social networks, each accounting for about 3% of the total retail market[2].

In this structure, Digikala holds about half of the e-commerce market that is, close to 1.5% of the total retail market in Iran. In contrast, Instagram is the dominant player in social commerce; a sector that, in terms of size, is on par with the entire official e-commerce market.

This analysis is not just an external view. Hamid Mohammadi, CEO of Digikala, in an interview with Peyvast media in December 2020/January 2021 (Dey 1399), explicitly stated:
"The biggest competitor of Digikala is the offline market with a 98% share... The second biggest competitor of Digikala is Instagram as a large marketplace."[5]
This statement, which was made before the filtering of Instagram, confirms the economic position of this platform from the perspective of official market players.

Filtering: Shock and Return

With the start of filtering in September/October 2022 (Mehr 1401), the Instagram commerce ecosystem faced a serious shock, and due to the protests at that time, this network was filtered. According to Padro data, the number of active stores decreased from about 630,000 to 330,000; a drop of about 47%. Simultaneously, Padro's CEO reported a 90% drop in sales and the cancellation of more than 70% of orders in the months immediately following the filtering[1].

However, this situation did not remain stable. By 2024, the number of active stores once again reached about 700,000; growth that shows users' adaptation, expansion of the use of filter circumvention tools, and the dominance of economic need over technical restrictions.

The Vital Role of Instagram for Women

One of the most important dimensions of the Instagram economy in Iran is its role in employment and income generation for women. According to estimates based on Meta data, about 46% of Instagram users in Iran are women; equivalent to more than 21 million people[4].

This platform allows women to engage in economic activity without the need for initial investment, without owning commercial space, and outside the constraints of the traditional market. The Bourse & Bazaar Foundation report also emphasizes that filtering Instagram has disproportionately affected the livelihoods of women and weakened one of their main channels of economic independence[5].

1. Digikala, Annual Report 2023, market structure and seller statistics
2. Iran Students Polling Center (ISPA), national surveys on social network use, 2021-2024 (1400-1403)
3. Independent analysis of Instagram advertising tools data (Instagram Ads & Audience Tools); consistent with DataReportal reports
4. Interview with Hamid Mohammadi, CEO of Digikala, Peyvast media, December 2020/January 2021 (Dey 1399)
5. Bourse & Bazaar Foundation, "Iran's Instagram Crackdown Is Jeopardising Women's Livelihoods", March 2024
7. Padro, CEO and data of the Instagram commerce ecosystem, 2024 (1403)

Conclusion:

Filtering Didn't Work and Made VPN Use Widespread

Filtering Instagram was done with the assumption that restricting access could reduce the use of the platform and its economic effects. However, the evidence shows that this policy not only failed to achieve its goal but also had reverse and destructive consequences.

From an economic perspective, Instagram had become the main infrastructure of online retail commerce in Iran before filtering. After the imposition of restrictions in August/September 2022 (Shahrivar 1401), an initial shock entered the ecosystem: a sharp drop in sales, the temporary closure of tens of thousands of businesses, and a decrease in the income of millions of people. But this effect was short-term. In less than two years, the number of active stores returned to the pre-filtering level and even surpassed it. This return was not due to the lifting of restrictions, but due to the adaptation of users and businesses to the new conditions.

The most important result of this adaptation was the widespread normalization of using filter circumvention tools. Survey data and credible polls show that the majority of internet users in Iran regularly use VPNs. In practice, instead of reducing access, filtering reduced the use of Instagram from being a deterrent and politically/socially costly issue to being a routine technical action installing and using a VPN. A cost that a large part of society accepted, because the economic and livelihood benefits dependent on Instagram were vital for them.[7]

From this perspective, filtering Instagram not only failed to remove the economic function of the platform, but led to the institutionalization of restriction-circumvention behavior. Small businesses, women entrepreneurs, young people, and home-based activists the groups most dependent on Instagram turned to permanent VPN use faster than others.

At a more macro level, this experience shows that when a platform becomes economic infrastructure, removing it is practically impossible. The market and livelihood needs cause users to find alternative paths. In such conditions, filtering becomes more a factor in weakening policy, reducing trust, and spreading informal behaviors rather than an effective governance tool.

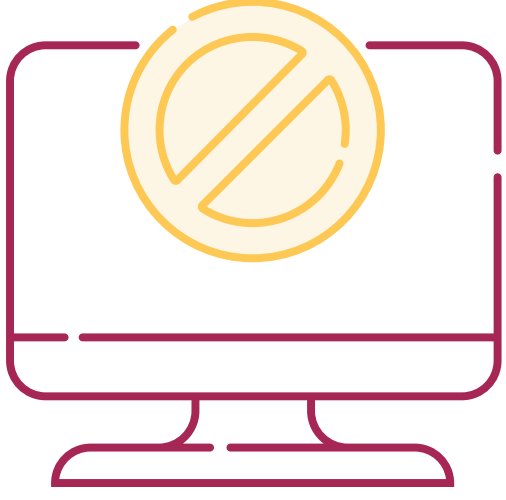
7. Padro, CEO and data of the Instagram commerce ecosystem, 2024 (1403)

Filtering File:

Analysis of the VPN-Selling Market and Players

There is a great deal of speculation about the size of the VPN-selling market in Iran. The President[8], in a speech in January/February 2026 (Bahman 1404), stated this market at 30 HMT (30 trillion Toman, approximately $200 million USD at 150,000 Toman per USD). A figure that is also very close to the estimates of the E-Commerce Association. Our estimates show that at least 18.7 to 22.2 trillion Toman ($125-148 million USD) in direct income, about $47 million in income through international funds, and millions of dollars in advertising income make up the total value of this market, totaling 30 trillion Toman (~$200 million USD).

According to the exclusive data of this report, prepared with the help of the ISPA polling center, the use of VPN apps with a share of nearly 55% has the highest share among the various methods of obtaining VPNs. Software that is mostly (at least apparently) operated by foreign companies, and some of which work through international funding. Alongside this option, the 43.2% share belongs mostly to Iranian sellers. Users obtain their VPNs through friends and acquaintances, or through purchases from people they know (retail), or through public distribution channels (mostly Telegram sales channels).



8. https://www.tasnimnews.ir/fa/news/1404/11/23/3515826/ — President's statement on the VPN-sales market reaching 30 thousand billion Toman

How do you obtain your VPN?

Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)

How users obtain VPNs by demographic variables

	Age			Education			Place of Residence		
	15-29	30-49	+50	Below diploma	Diploma	University	Provincial capital	Non-capital city	Village
Use an app	55.1	46.6	27	43	47.1	48.2	46.3	47.9	42.6
From wholesale seller	5.1	2.1	0	0.8	3.3	3	3.2	2.6	1.1
From retail seller	5.9	8.2	6.3	6.2	7.2	7.8	7.5	8.4	4.6
From acquaintances, free	22	26	36.5	24.6	26.1	28.3	29.6	23.2	26.4
Don't use	11.9	17.1	30.2	25.4	16.3	12.7	13.4	17.9	25.3
Total	100	100	100	100	100	100	100	100	100
Significance	0.003			0.253			0.357		
Coefficient	0.160			0.106			0.098		

Is your app free or paid?

Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)

In the first group, close to 89.7% of users stated that they use free apps.
Also, Psiphon and Jump Jump products together hold at least 36% of this market.

Number of Iranian internet users	73.1 million
VPN penetration rate	82.4%
Number of VPN subscribers	60.2 million
Final estimate	**18.7 trillion Toman per year (~$125 million USD)**

If we want to extrapolate the "don't know" and no-answer options to the answered options, it can be estimated that these apps together hold close to 36% of this section of the market. More than 50% of users who use VPNs in paid form pay more than 100,000 Toman per month (approximately $0.67 USD at 150,000 Toman per USD). In the obtained statistical population, the average ARPU of these users was on average 176,000 Toman (approximately $1.17 USD). If we add free users to our analysis, the average ARPU of all users will reach 26,000 Toman (approximately $0.17 USD).

But if we want to examine the figures more precisely instead of an overall estimate, we will have:

App Type		Market Share	ARPU	Total Income
Mostly foreign apps	Free app	50.2%	–	Advertising and international funds: • ~$30 million from $94 million OTF budget • $17.7 million emergency budget for Iranian users
	Paid app	5.5%	176,000 Toman (~$1.17 USD) (based on overall average)	~6,900 billion Toman (~$46 million USD)
Mostly Iranian connections	Free from acquaintances	32%	–	–
	Purchase from retail	8.9%	176,000 Toman (~$1.17 USD) (based on overall average)	~11,200 billion Toman (~$74.7 million USD)
	Purchase from wholesale	3.2%	176,000 Toman (~$1.17 USD) (based on overall average)	~4,000 billion Toman (~$26.7 million USD)

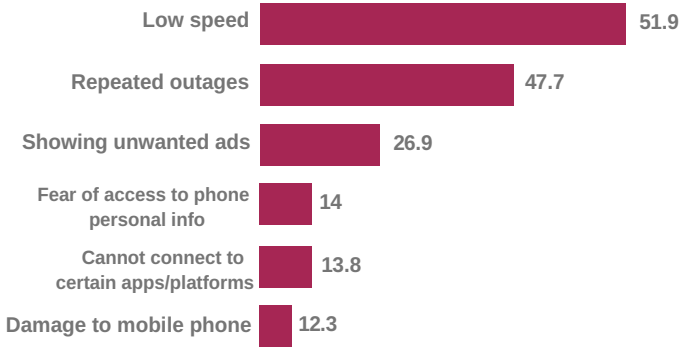
In this report, we did not stop at this stage and, for the first time, prepared a report on some VPN sellers through case study. As a result, we contacted more than 50 large VPN sellers in the country's market, and 26 of them agreed to talk to our colleagues. Investigations in this report show that the total income of these players is estimated at more than 1.3 trillion Toman (approximately $8.67 million USD); some of them pay close to 1 billion Toman per month (~$6,667 USD per month) just for bandwidth costs. The price of buying traffic for these subscribers is estimated at about 300-700 Toman per GB (~$0.002-0.0047 USD per GB) and they sell each GB of traffic to their customers from 1,500 to 5,000 Toman ($0.01-0.033 USD). Three foreign server providers Hetzner, OVH, Gcore have the largest share in the supply chain of these VPN sellers.

#	Monthly Traffic Purchase (million Toman / USD)	Number of Domains	Server Supply Source	Estimated Monthly Income (million Toman / USD)
1	1,200 / ~$8,000	85	OVH (FR, DE), Gcore (TR), M247 (NL)	7,200 / ~$48,000
2	1,200 / ~$8,000	85	OVH (FR, DE), Gcore (TR)	7,200 / ~$48,000
3	750 / ~$5,000	100	OVH	4,500 / ~$30,000
4	500 / ~$3,333	70	Hetzner, OVH, Gcore	3,000 / ~$20,000
5	970 / ~$6,467	80	Hetzner, OVH	5,820 / ~$38,800
6	600 / ~$4,000	100	Gcore	3,600 / ~$24,000
7	1,000 / ~$6,667	70	Hetzner, OVH	6,000 / ~$40,000
8	900 / ~$6,000	70	Hetzner, Gcore	5,400 / ~$36,000
9	960 / ~$6,400	60	Hetzner, Gcore	5,760 / ~$38,400
10	700 / ~$4,667	70	Hetzner, Gcore	4,200 / ~$28,000
11	600 / ~$4,000	50	Hetzner	3,600 / ~$24,000
12	900 / ~$6,000	80	OVH	5,400 / ~$36,000
13	1,000 / ~$6,667	70	Hetzner, OVH	6,000 / ~$40,000
14	800 / ~$5,333	70	Hetzner, OVH, Gcore	4,800 / ~$32,000
15	750 / ~$5,000	70	Hetzner, OVH	4,500 / ~$30,000
16	900 / ~$6,000	150	Hetzner	5,400 / ~$36,000
17	500 / ~$3,333	70	Hetzner, OVH, Gcore	3,000 / ~$20,000
18	400 / ~$2,667	60	Hetzner, OVH, Gcore	2,400 / ~$16,000
19	300 / ~$2,000	70	Gcore	1,800 / ~$12,000
20	500 / ~$3,333	88	Hetzner	3,000 / ~$20,000
21	300 / ~$2,000	70	Hetzner	1,800 / ~$12,000
22	490 / ~$3,267	60	Hetzner	2,940 / ~$19,600
23	700 / ~$4,667	70	Hetzner	4,200 / ~$28,000
24	800 / ~$5,333	70	Hetzner, OVH	4,800 / ~$32,000
25	600 / ~$4,000	50	Hetzner, OVH, Gcore	3,600 / ~$24,000
26	500 / ~$3,333	70	Hetzner, OVH, Gcore	3,000 / ~$20,000

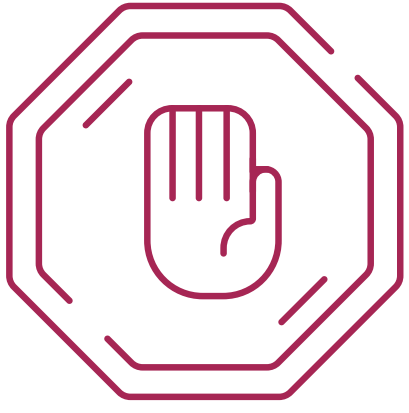
Unfortunately, the bitter irony is that we have a law that more than 80% of the people and more than 90% of young people do not follow, billions of Toman are paid for it, and ultimately it only causes more suffering for the people and the destruction of the digital economy.

What problem do you usually encounter when using VPNs?

Tehran E-Commerce Association - ISPA - December 2025/January 2026 (Dey 1404)



Sanctions File:



Technology Should Be Among the Items Forbidden from Sanctions!

The matter becomes bitter when we know that the pieces of this unequal puzzle are completed with a phenomenon called passive unilateralism! In fact, this issue occurs when countries other than these two groups primary sanctioner and sanctioned take a supportive stance toward sanctions, and even in many cases, much more than the world's powerful countries, define restrictions and make sanctions more effective (over-compliance)! Ultimately, this issue creates a behavior that can be called passive unilateralism. That is, countries that are not direct sanctioners and incidentally are aware of the illegality of many sanctions but behave in a way that makes sanctions more effective.
Before discussing ways to counter technology sanctions, we must also pay attention to the justification of sanctioning countries; in this sense, it must be said that the act of imposing sanctions is itself contrary to the rule of the international system; because this system is defined based on equal sovereignty, and sanctions meaning the imposition of one's will on another contradict this principle of equality. But many countries, with a superficial view of this issue, justify their sanctions: with humanitarian claims, they impose various sanctions against countries.
We see an example of this regarding wars; despite explicit rules saying that civilians, the environment, and so on should not be harmed in wars, we have seen many times that this is not observed in wars.

Some websites that some Iranian users observed are accessible through some Iranian internet providers in the past 6 months:

atlassian.com	www.nike.com	zoom.us	bootstrap	visual studio	sony.com	king.com

Some websites that sanctioned Iranian users in the past six months:

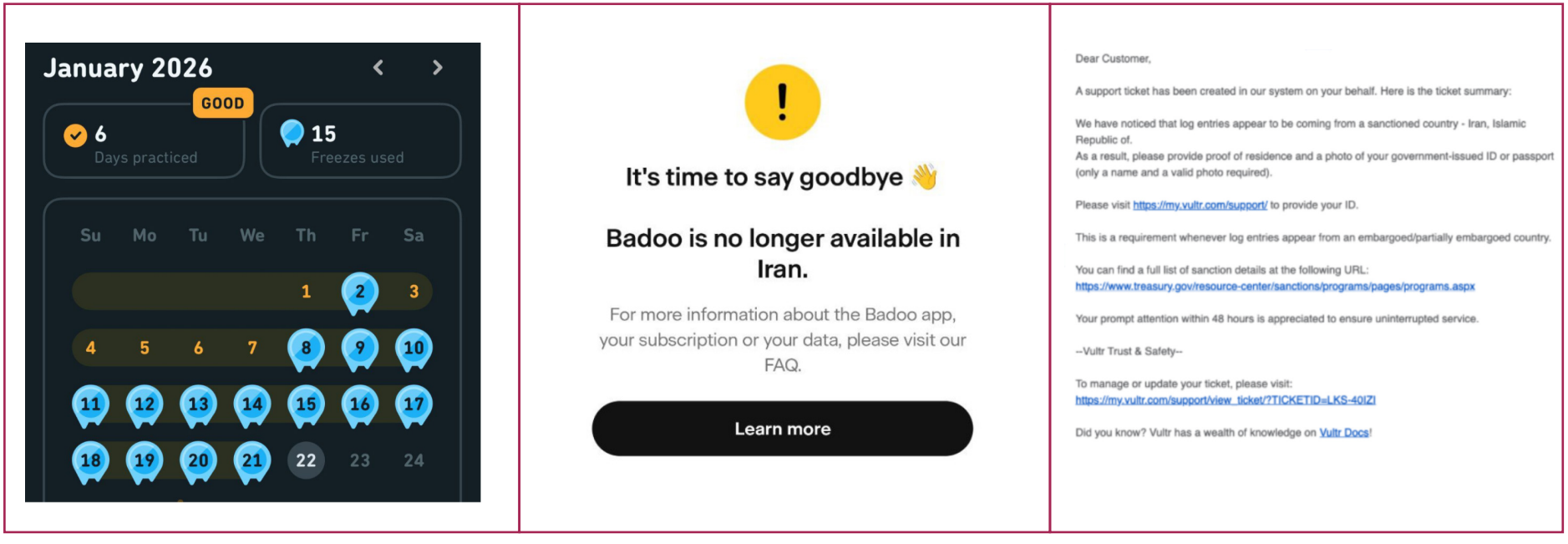
Vultr.com	skills.google	playground.com	base44.com	pub.dev	web.ub.edu	Gmail (Registration State)

When We Talk About Over-Compliance of Companies on Technology Sanctions, What Are We Talking About?

Out of the top 1 million domains, 197,000 — about 19% — are blocked for Iranian users due to U.S. sanctions.

For this reason, according to a recent survey by the E-Commerce Association with the help of ISPA, this issue is reported as the main priority of 6% of people for using VPNs. Of course, it should be noted that many users do not understand the difference between filtered or sanctioned sites and use VPNs to deal with access disruptions, so this number is estimated to be much higher in reality.

As seen in the image below, three types of behavior toward Iranian user technology are observed. Duolingo (a language learning app) since the time of the internet shutdown puts the "owl/character" of Iranian users in pause mode so that the educational memory of Iranian users in this app is not lost. In the middle image, a dating app is shown that, incidentally, simultaneously with the protests in Iran in winter 2025/2026 (Zemestan 1404), closed the accounts of Iranian users. In the right image, it is clear that with one report (!), the cloud infrastructure website Vultr sanctions Iranian users:



Beyond Economic Damages, the Routine Internet Shutdown and the Whitelist Policy: A Totalitarian Digital Behavior[1] Damaging Social-National Fabric:

The issue of internet shutdown is not a one-dimensional event whose impact can only be referenced in relation to online businesses; the issue of continuous and absolute disconnection of communication and internet access is something resembling digital control or the same Digital Panopticon; its main damage is to the institutionalized social capitals of the country. This damage can be examined in the long-term effect of the issue and the danger of losing the hope and prospects of Iranians in creating value for this country.

For years, the internet has been defined as a modern communication-social version. According to the Declaration for the Future of the Internet[11] in 2022, the internet is defined as a unified and integrated network that is a tool for life opportunities, technology, free flow of information, and a tool for democratic and economic progress. Regardless of how much the signatory countries of the "Declaration for the Future of the Internet" influence technology sanctions,

The more important issue of internet shutdown by domestic policymakers is harm to the essence of the country's institutions and social capitals. In this sense, according to sociologists, imposing any restriction or shutdown as a kind of guided intervention in the internet platform is reminiscent of Habermas' Public Sphere idea; an idea that explains how to intervene in/change the public space, in favor of the policymaker[12]. It is as if the policymaker, through internet shutdown, gets closer to a kind of punitive behavior and preventive censorship and is unaware of the macro impacts of the issue incidentally, those impacts that cannot be counted in numbers! With the practice of internet shutdown, he inflicts irreparable damage on widespread despair, increasing digital divide in the country, increasing the rate of one-way migration, and damages destroying institutions and social capitals; damages that are not displayed in the form of numbers and quantitatively, and whose long-term effect targets the concept of Iran! In this sense, the SIM card policy and any kind of special-treatment for the basic right of the people is also erasing the issue and not recognizing the basic right of the people, and a factor in reducing interpersonal trust among people and against the basic right of citizenship. Damages whose depth no number can describe; what number can be placed against the closure of a home business that sells its products on social networks? What number can be placed against the despair and one-way migration of an Iranian citizen? Does the Iranian policymaker see a connection between his decisions and this migration behavior of Iranians?

Top nationalities for people crossing the channel in small boats

Rank	2021	2022	2023	2024*
1	Iran	Albania	Afghanistan	Afghanistan
2	Iraq	Afghanistan	Iran	Vietnam
3	Eritrea	Iran	Turkey	Iran
4	Syria	Iraq	Eritrea	Syria
5	Afghanistan	Syria	Iraq	Eritrea
6	Vietnam	Eritrea	Syria	Sudan
7	Sudan	Sudan	Sudan	Iraq

Source: Home Office Irregular Migration Statistics, year ending September 2024, table Irr_01. *2024 data up to end of September. • Created with Datawrapper

The table abow shows that Iranians rank first among nationalities with illegal migration by inflatable boat from the English Channel:

9. https://en.wikipedia.org/wiki/Panopticon
10. Digital Panopticon
11. https://2021-2025.state.gov/declaration-for-the-future-of-the-internet/
12. https://globalnetworkinitiative.org/wp-content/uploads/Disconnected-Report-Network-Disruptions.pdf

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