NIMA ESKANDARI

KEY FIGURE OF ELECTRONIC MONITORING OF IRANIAN PROTESTERS

UNVEILING
UNTOLD
REALITIES

TRACKING PROTESTERS AND OPPONENTS



Nima Eskandari

February 2024

Research Hypothesis: Nima Eskandari, who is the founder of Tenisol, is a key figure in facilitating electronic surveillance of Iranian protesters by Iran's regime and also helping the regime to bypass the US sanctions.

.Findings

1. Topline Findings

- Nima Eskandari uses a front company in the UK on behalf of ArianTel and helps the development of SIAM, a technology that has been helping the Islamic Republic of Iran to track down protestors and dissidents in Iran.
- Nima Eskandari makes tens of thousands of USD by providing a sanction-evading service to ArianTel and helping it to purchase necessary technologies and software that cannot be sold to Iran due to the US sanctions against the Islamic Republic.

2. Identity

One-sentence Identifier: Nima Eskandari, the founder of a UK-based company Tenisol, provided surveillance software and technologies to the Islamic Republic to track down Iranian dissidents in Iran.

Nima Eskandari (نیما اسکندری) was an unknown individual before November 2022, no one knew about him or knew who he was. As a result, the amount of information about him is limited. According to the British Government's Companies House website, Eskandari was born in July 1986 and has three registered companies in England, and is an Iranian-British. He is married to Masomeh Faayaz, who is a Landscape Architect & Urban Designer at WSP in the UK, and with high confidence, he has two children, one boy and one girl, the name of the boy is Ryan. The following list is the registered and active companies of Eskandari in England:

- *Tenisol Ltd.*: Active in satellite telecommunications and technology consultancy
- *Emeatra Ltd.*: Active in selling telecommunication, audio, and video equipment
- Agtelligence Ltd.: Active in data processing and natural sciences and engineering

Eskandari also has another two companies that he resigned as a director of: Masom Landscape Architecture Ltd. where he was co-director with his wife and Family Office Investment Ltd. that was dissolved in April 2023.

As mentioned above, Eskandari was not a known person before the publication reports of The Intercept and Citizen Lab in November 2022 and January 2023, respectively. Both reports were published based on leaked emails from ArianTel, a telecommunication company based in Tehran that developed SIAM for Iran's regime. The reports explained in detail how Eskandari, with his company, Tenisol, helped ArianTel acquire software and hardware to develop SIAM (سیام) for the Islamic Republic. Both reports mentioned different email exchanges between Eskandari/Tenisol, PROTEI Ltd (a Russian telecommunication company), PortaOne Inc. (a Canadian telecommunication company) to help ArianTel in the development of SIAM and training of their staff. SIAM is a technology that has been helping the Islamic Republic of Iran track down protestors and dissidents in Iran and was developed with the help of PROTEI Ltd. and PortaOne Inc. According to the SIAM documentation, Iran's Communications Regulatory Authority (CRA), which is under the US and the EU sanctions, has the capacity to acquire details of any SIM card holder in Iran in real-time and apply different restrictions on the communication of those SIM cards or identify the location of any active SIM card. For example, SIAM allows Iran's regime to disable 3G/4G of SIM card holders in a particular area, such as areas where Iranian citizens are protesting against the regime. It also allows the regime to identify individuals with an active SIM card in an area where anti-regime protests happen.

As mentioned above, Eskandari has two companies that are active in telecommunication: Tenisol and Emeatra. Although we will discuss Tenisol more in the following paragraphs and how it has made a name for itself as a provider of surveillance technologies to the Islamic Republic and a facilitator to bypass the US sanctions against the regime, Emeatra must not be forgotten as it is a telecommunications and network supplier based on its defunct website, however, it is an active company listed on the UK's Companies House website.

Based on accounts filling of Emeatra from October 31 October 2019 to 30 April 2023, Emeatra had a sharp increase in terms of assets on 30 April 2022, which aligns with Eskandari services to ArianTel and the Islamic Republic. The following table details Emeatra's assets from 2019 to 2023:

Year	**Current Assets in GBP**
2019	69
2020	24,874
2021	38,146
2022	**157,808**

2023	4,333

As a result, we believe Emeatra has had a role in providing technology and bypassing the US sanction for ArianTel and the Islamic regime, although there is no hard evidence such as emails that we have for Tenisol. The reason we believe this sharp increase in Emeatra's assets matches with the dates of emails that Eskandari exchanged with ArianTel who acted as a supplier for them.

According to our findings, which we will discuss in the following paragraphs, Eskandari and Tenisol have been acting as a front company for Iran's regime that has been helping the regime to bypass the US sanctions and facilitating payment for ArianTel (See Image 1 in Appendix A).

In October 2022, more than 320,000 emails from ArianTel were leaked on the internet by (an) anonymous actor(s) - we analyzed more than 750 email exchanges amongst the management of Telinsol, ArianTel, PROTEI, and PortaOne - which showed that the main client of Tenisol was ArianTel, and Eskandari made tens of thousands of euros as commissions by facilitating payments and negotiating contracts and services on behalf of ArianTel. A comparison of the leaked emails confirms that Ariantel representatives are using both Telinsol and Ariantel email addresses, suggesting an affiliation between the companies. Proof of this claim is contained in an email dated 20 July 2020 that reveals that Farzad Doost Mohammadi, Chief Technology Officer at ArianTel, told Vladimir Freinkman, Vice President of Marketing and Business Development at PROTEI, "Telinsol has taken all its commissions in advance" (See Image 2 in Appendix A).

Based on exchanged emails between Eskandari and Tenisol, the first communication between Telinsol and ArianTel was initiated on 4 March 2018, as Eskandari requested 1.2 million USD for various software licenses (See File 1 in Appendix B). As mentioned above, Telinsol has been acting as a front company that manages all financial transactions between ArianTel and its service providers around the world. An email dated 8 April 2019 shows that Eskandari sent two contracts to Doost Mohammadi that proved Telinsol was a shell company between ArianTel and PROTEI (See Image 3 in Appendix A).

An email dated 7 May 2019 (See Image 4 in Appendix A) is crystal clear proof that Eskandari and his partner at Telinsol, Simon Edward Maddox, knew what they were doing in terms of bypassing the US sanctions by offering various solutions to decrease their exposure to potential liabilities from the US Government in terms of bypassing the US sanctions. In this email, Eskandari asked ProtaOne to remove USD currency from all documents as he knew the payments in USD were subject to US sanctions compliance, and they would be in breach of the US sanctions. This request is in contrast with the initial invoice that Eskandari issued to ArianTel, which asked for 1.2 million USD (See Image 5 in Appendix A).

According to our analysis of more than 750 emails, other key players in the development of SIAM for ArianTel were aware of what they were doing and carrying out business with ArianTel was not in their interest. For example, Michael Chackal, Business Development Director at PortaOne, on 29 October 2018 said, "...we [ProtaOne] prefer not to mention any company or country in the contract" (See Image 6 in Appendix A). In another instance on 12 June 2019, Chackal asked ArianTel and Eskandari not to communicate with ProtaOne via the official email address of ArianTel (@ariantel.ir) and requested that Eskandari create either telinsol.co.uk or a generic email address such as Gmail or Yahoo! for ArianTel's team (See Image 7 in Appendix A).

In terms of payment facilitation, there are various emails that show Eskandari made payments to different suppliers of ArianTel on behalf of this telecommunication company in Tehran, Iran. For example, Eskandari sent an email to Freinkman on 30 December 2019 explaining that he received funds from "the client", which means ArianTel, and then sent another email on 2 January 2020 explaining that PROTEI should receive more than 27,000 EUR by 3 January 2020 (See Images 8 & 9 in Appendix A). Back in 2018, when Eskandari initiated its operation on behalf of ArianTel, Doost Mohammadi asked Eskandari to write Telinsol's bank account in the PROTEI contract, and Eskandari made the payment (See Image 10 in Appendix A).

Due to the US sanctions against the Islamic Republic, Apple does not provide services to businesses in Iran to open developer accounts to upload their iOS apps on the App Store. As a result ArianTel could not join the Apple Developer Program and open an account because they needed to have a non-Iranian mobile number and a valid payment card such as a Master or Visa card. According to an email dated 17 March 2021, Eskandari personally facilitated the evasion of the US sanctions for ArianTel on a personal level. This email reveals that Eskandari was asked to provide a UK mobile number that would allow ArianTel to join the Apple Developer Program. (See Image 11 in Appendix A and File 2 in Appendix B).

Furthermore, Telinsol and Eskandari were aware of the usage of SIAM and how it benefited Iran's regime to track down the Iranian dissidents in the country via their mobile SIM cards. For example, an email dated 1 May 2019 shows Tenisol the exact application of SIAM: "The network service can be enabled/disabled, i.e. outgoing SMS, incoming SMS, data service, voice service and etc" (See Image 12 in Appendix A, and File 3 and File 4 in Appendix B for the detailed technical support of Telinsol).

The following table details Tenisol's assets from 2016 to 2023 based on submitted documents on UK's Companies House. As it is clear, the current assets of Tenisol, which are directly linked to its revenues, have increased massively in the years that Tenisol provided services to ArianTel based on leaked emails. These years are bold on the table.

Year	Current Assets in GBP
2016	251,688
2017	365,441
2018	856,515
2019	**1,549,096**
2020	**1,379,842**
2021	**1,131,214**
2022	853,272
2023	170,149

After the revelation of Eskandari's role in helping Iran's regime to develop SIAM, he started to delete all related information about him and linked to Tenisol. For instance, Eskandari has changed the status of his profile on F6S, which is a platform for company founders to grow their networks, from public to private. Also, in a letter from Citizen Lab's lawyer to Tenisol, they stated that Tenisol has started "scrubbing their public internet profile": "We also note that Telinsol Ltd., and its senior employees, appear to be in the process of scrubbing their public Internet profiles to remove references linking their work to Iran.". Additionally, since January 2023, Eskandari has started to whitewash his profile and activities on the internet by focusing on Agtelligence and undertook various interviews with different websites to ensure his name came up with his startup not Tenisol and the report from Citizen Lab. For example, on 18 July 2023, he did an interview with Harwell, and said he came to the UK with an entrepreneur's visa in 2014 and later he launched Agtelligence, which again is not true as he started Tenisol in May 2015 and six years later in November 2021 he established Agtelligence.

Although Tenisol is an active company, Eskandari has changed his relationship with Tenisol on LinkedIn (See Images 13 & 14 in Appendix A), and he is not the Founder and Board Member of Tenisol since June 2022. This is untrue as Eskandari signed the full account of Tenisol as a Director on 31 January 2024. We have also received a tip from a source inside Iran that Eskandari moved his activities related to Iran and ArianTel from London to Dubai in early 2023.

3. Suspected Kleptocratic Connections and Activities

According to the leaked emails of ArianTel, Eskandari has had a direct role in terms of suppression of Iranian protestors in Iran by providing technology to ArianTel, which this telecommunication company uses in their surveillance system, SIAM. In addition, Eskandari and his company have been facilitated bypassing the US sanctions against Iran's regime by helping ArianTel to purchase different technology and software.

4. Significance

Eskandari and Tenisol were not well-known and as mentioned in I.2, both of them became known names after two reports were published by The Intercept and Citizen Lab. ArianTel, which was the main client of Tenisol, was also not well-known before these reports.

The findings in this dossier are novel as they are based on hard evidence from leaked emails, which no one has done in this level of detail. Although nearly all Persian media outlets have covered the published reports of The Intercept and Citizen Lab, no Persian media outlets have checked and analyzed the leaked emails of ArianTel. This lack of coverage comes back to the lack of tools and technical knowledge that is very common among Iranian journalists and the majority of them just focus on ready-to-use pieces of news and do not try to do more investigation and in-depth research. As a result, the finding of this dossier is unique and new to the public.

The majority of the Iranian people are aware that the regime carries out surveillance on them and tracks them via SIM cards, but the details of the technology and its name - SIAM - and who has helped the regime to develop and implement this technology were unknown. As mentioned in I.2, SIAM allows the intelligence services in Iran to track individuals via their active SIM cards and to also shut down their internet connection on their mobiles in real time. In a nutshell, Eskandari has had a direct role in the development and implementation of SIAM.

II. Value for Civic Activists

After the publication of the reports by The Intercept and Citizen Lab, we prepared a dossier for the US Treasury regarding Tenisol and Eskandari. The same dossier was submitted to the EU, and also the role of ArianTel in the development of SIAM was discussed with the EU officials. As a result, ArianTel was sanctioned by the EU on 24 April 2023. ArianTel is still not sanctioned by the US and UK Governments. Also, Eskandari and Tenisol have not been sanctioned by the EU, UK and US. As a result, activists can work on convincing the Western Governments to sanction these three entities. By sanctioning these three entities, activists can send a strong message to others who work and facilitate software and other technology acquisition to the regime from the West that they are not immune from the sanction of the Western

Governments if they try to make a profit by providing services to Iran's regime that help the regime to violate human rights of Iranian citizens.

1. Pertinent Activists

As mentioned above, activists can campaign to put pressure on the Western Governments to sanction ArianTel, Tenisol and Eskandari. The successful sanctions against these entities and individuals will send a strong message to others who are outside of Iran and work for/with Iran's regime to provide technology and software for the internet censorship or surveillance. The aim should be to show the high price of collaboration with Iran's regime for individuals and entities who help the regime purchase or develop different technologies from the West.

2. Avenues for Action

Sanction of entities and individuals is one of the most powerful tools that Iranian activists and civil society organizations have. As mentioned in II.1, campaigning to sanction Telisol, Eskandari and ArianTel should be on top of the to-do list. Also, naming and shaming is another avenue that can be pursued by activists. For example, Eskandari seems to have received funding from the UK Government - according to his LinkedIn profile (See Image 14 in Appendix A) - it will be an impactful action to defund his project by showing him as a surveillance technology provider to Iran's regime.

3. Red Team: Anticipated Critique and Response

We do not believe there would be any backlash, as all findings come from leaked emails of ArianTel and it is not possible to be denied due to the nature of the source and investigation.

III. Implications for Future Research

1. Recommendations for New Leads or Expanded Research

According to our source inside Iran, Tenisol has moved its operation from London, UK to Dubai, UAE. Although our source explained that he does not know the exact date, our estimation, based on the whitewashing operation of Eskandari since the publication of Citizen Lab's report, is sometime in early 2023. The main reason for moving from London to Dubai is that Dubai is a safe haven for Iran's regime and its collaborators in terms of bypassing the US sanctions, also less public data is available about registered companies in comparison with the UK. As a result, more investigation into the potential operation of Eskandari in Dubai would be interesting, although it would not be an easy investigation due to the nature of cooperation laws in Dubai.

IV. Methodology

1. Sources Utilized

This dossier prepared is based on the leaked emails of ArianTel and analyzes of more than 750 email exchanges amongst the management of Telinsol, ArianTel, PROTEI and PortaOne. All of the analyzed emails are downloadable from here:

https://drive.google.com/file/d/1CMOzIuwh_44tgsaedzeYQTeWz-Wa2kU2/view?usp=sharing

ArianTel emails were initially leaked by (an) anonymous actor(s) to The Intercept and later was published on the Distributed Denial of Secrets website.

2. Source Limitations

There was no source limitation as the full leak of ArianTel was available. Ideally, it would be beneficial to have a copy of all of the emails from Tenisol which have not been leaked so far.

V. Appendix

A. Images

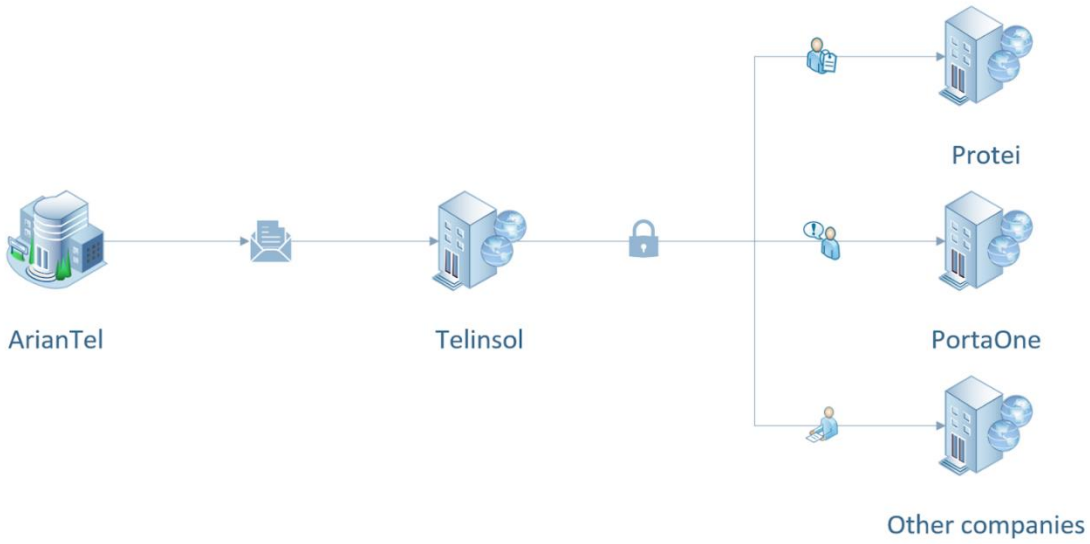


Image 1

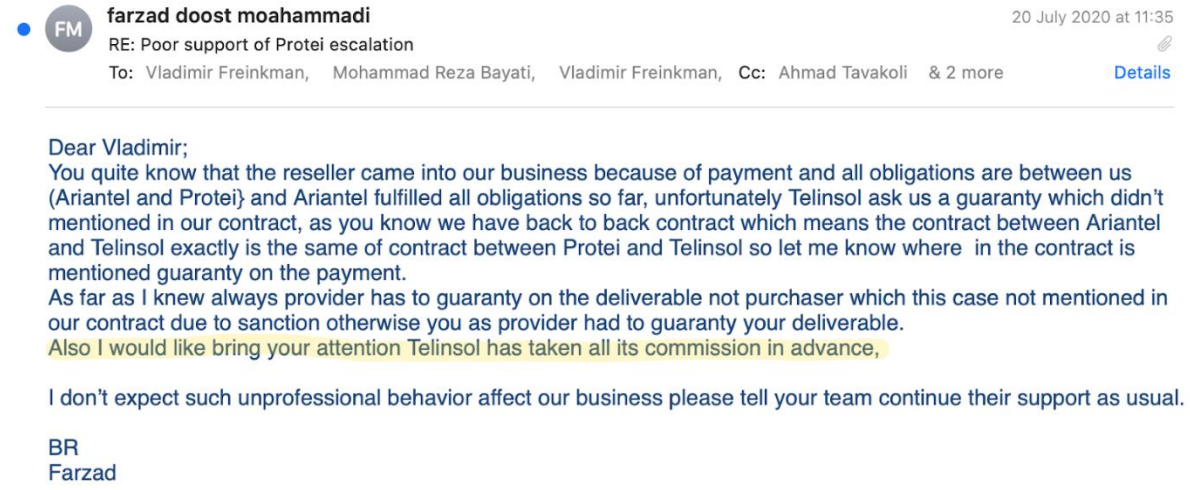


Image 2

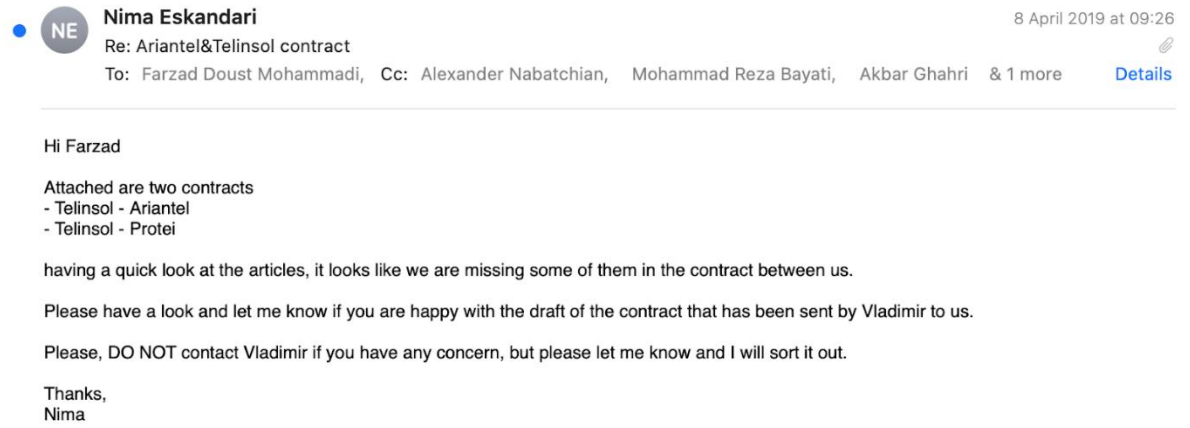


Image 3

Nima Eskandari via RT 7 May 2019 at 09:55

[PortaOne #637777] PortaOne Converged BSS-OSS and Billing for Telinsol in UK

To: farzad.d@telinsol.co.uk, ziba@telinsol.co.uk, Cc: a.ghahri@ariantel.ir, & 7 more Details

Reply-To: sales@portaone.com

Dear Michael

Please remove USD in all documents.

Regards,
Nima

<http://www.telinsol.com>

<http://www.linkedin.com/company/telinsol>

Nima Eskandari

Director / *Telinsol Ltd*

A: 73 Maple Road, Surbiton, England, KT6 4AG

P: +44 (0) 2081235796 M: +44 (0) 7447433823

E: Nima@Telinsol.co.uk W: www.Telinsol.co.uk

Image 4

AG **Akbar Ghahri** 4 March 2018 at 00:40

Fwd: Quote QU-0041 from Telinsol Ltd for AryanTel

To: secretary

Begin forwarded message:

From: Nima Eskandari <messaging-service@post.xero.com>
Subject: **Quote QU-0041 from Telinsol Ltd for AryanTel**
Date: ۸ ۱۳:۰۲:۵۸ ساعت ه.ش.، ۱۳۹۶ بهمن (GMT+۳:۳۰)
To: a.ghahri@aryancell.com
Reply-To: info@telinsol.co.uk

Dear Akbar,

Thank you for your enquiry.

Here's quote QU-0041 for $USD 1,200,000.00.

View your quote online: https://in.xero.com/OOkFNoqh2Aer2iaUl1IRe9Jxer5jJzv4B2YMKjPI

From your online quote you can accept, decline, comment or print.

If you have any questions, please let us know.

Best Regards,
Telinsol Ltd

Terms:
Payment: In advance.

Image 5

-----Original Message-----
From: Michael Chackal [mailto:michael.chackal@portaone.com]
Sent: Monday, October 29, 2018 3:59 AM
To: farzad.d@ariantel.ir
Cc: z.rezaei@aryancell.com; a.ghahri@aryancell.com; s.ghahri@ariantel.ir; nima@telinsol.co.uk; 'Roman Khalenkov' <roman.khalenkov@portaone.com>; 'Andriy Zhylenko' <andriy.zhylenko@portaone.com>
Subject: RE: [PortaOne #637777] PortaOne BSS-OSS for Ariantel MVNO

Hello Farzad,
Thanks for your email.

About contract:
We could sign the contract and receive payment from Telinsol and we kindly suggest that Ariantel staff interacting with PortaOne for technical support to use @Telinsol.co.uk email aliases. We can sign an addendum to the EULA stating that Telinsol has an indefinite right to transfer the licence to "Telinsol Shareholders or Telinsol affiliates", but we prefer not to mention any company or country in the contract. Would this be acceptable?

About SLAs:
1. In the case of the failure of a node WITHIN a cluster it would take about 20 seconds (a configurable timeout) to move services to a different node.
2. In the case of the failure of a node WITHOUT out of a cluster it would take about 10 mins to a apply a new configuration 3. In the case of catastrophic DC failure (and availability of remote site): We estimate it would take 2-5 days, depending on acceptance testing scope, to restore MAIN site configuration from backups on new machines.

Please let me know the next steps of your decision-making process and how I can assist.
Thanks and best regards
Michael

Michael Chackal
Business Development Director - PortaOne Inc.
Barcelona, Spain.
T: +1 866 747 8647 Ext. 7030
M: +1 613 495 0292
M: +34 660 85 41 88
email: chackal@portaone.com
http://portaone.com/
http://twitter.com/PortaOne
https://www.linkedin.com/in/michaelchackal

Image 6

Nima Eskandari 12 June 2019 at 10:12

Re: [PortaOne #637777] PortaOne Converged BSS-OSS and Billing for Telinsol in UK

To: mchackal@portaone.com, Cc: Farzad Doust Mohammadi, mohammad.h@ariantel.ir & 6 more Details

Hi Michael

The email will be ready today.

Thanks,
Nima

On Wed, Jun 12, 2019 at 9:57 AM <mchackal@portaone.com> wrote:

> Dear Ziba,
>
> Please request from Mr. Nima a "Telinsol.co.uk" email address for Mr. Mohammad Habibi. As agreed, all correspondence must be use "Telinsol" or generic (Gmail or yahoo) email addresses.
>
> Thanks and best regards,
> Michael
> --
> Michael Chackal
> Business Development Director - PortaOne Inc.
> Barcelona, Spain.
> T: +1 866 747 8647 - Ext:7030
> M: +1 613 495 0292

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Telinsol
Intelligent Solutions

Nima Eskandari

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P: +44 (0) 2081235796 M: +44 (0) 7447433823

E: Nima@Telinsol.co.uk W: www.Telinsol.co.uk

Skype: Telinsol

Image 7

Nima Eskandari 30 December 2019 at 08:25

Second payment

To: Vladimir Freinkman, Vladimir Freinkman, Farzad Doust Mohammadi, Akbar Ghahri & 2 more Details

Hi Vladimir

I hope you are well and enjoy festive season.

We received some fund from the client that is about 26K, I was I'll transfer it as soon as I can, perhaps after new year holiday.

Best Regards,

Nima Eskandari MBCS - Managing Director
TELINSOL LTD
73 Maple Road
Surbiton
KT6 4AG
United Kingdom
Mobile: +44 7447433823
Office: +44 2032909656

Image 8

NE **Nima Eskandari** 2 January 2020 at 10:56

Re: Second payment

To: Vladimir Freinkman, Cc: Vladimir Freinkman, Farzad Doust Mohammadi, Akbar Ghahri & 2 more Details

Dear Vladimir

Happy New Year!

EUR 27,078.51 transferred to your account today. It should hit your account today or tomorrow.

Regards,
Nima

Image 9

FD **Farzad Doostmohamadi** 29 December 2018 at 11:23

back to back contract

To: Nima Eskandari, Cc: akbar ghahri Details

Dear Nima;
Protaone contract almost has been finished and very soon will be signed by both parties we should provide a back to back contract and transfer all telinser's rights regarding Protaone contract to Ariantel, it would be highly appreciated if you provide template of contract because our English language is not enough good, then we will put our comments.
BTW are going to consider your bank account in Protei PO (Protei is our core provider) and payment should be done via your account so let me know how should do it.
I am looking forward hearing you

BR
Farzad

Image 10

KP **Khashayar Panbeian** 17 March 2021 at 10:37

RE: Appel ID

To: kamran baratnejad, Cc: Hamid Falahnejad Details

جناب آقای مهندس اسکندری
با سلام و احترام
ضمن تشکر از بذل توجه حضرتعالی در خصوص مشکل اپل آیدی خواهشمند است قبول زحمت فرموده و یک سیم کارت انگلیس رجیستر شده برای شرکت آرین تل ارسال فرمایید که مرحله فعال سازی two factor Authentication با موفقیت انجام پذیرد. در صورتی که این راه حل جوابگو نباشد احتمالا راه حل های نرم افزاری خارج از ایران برای رفع این مشکل وجود داشته باشد که با توجه به مشورتی که به صورت تماس تلفنی داشتیم پیگیری های این مسئله به لطف زحمات شما صورت می گیرد.
با تشکر

From: Nima Eskandari <nima@telinsol.co.uk>
Sent: Tuesday, March 16, 2021 11:43 PM
To: kamran baratnejad <kamran.b@ariantel.ir>
Cc: Khashayar Panbeian <Khashayar.p@ariantel.ir>; Hamid Falahnejad <hamid.f@ariantel.ir>
Subject: Re: Appel ID

سلام آقای برات نژاد عزیز

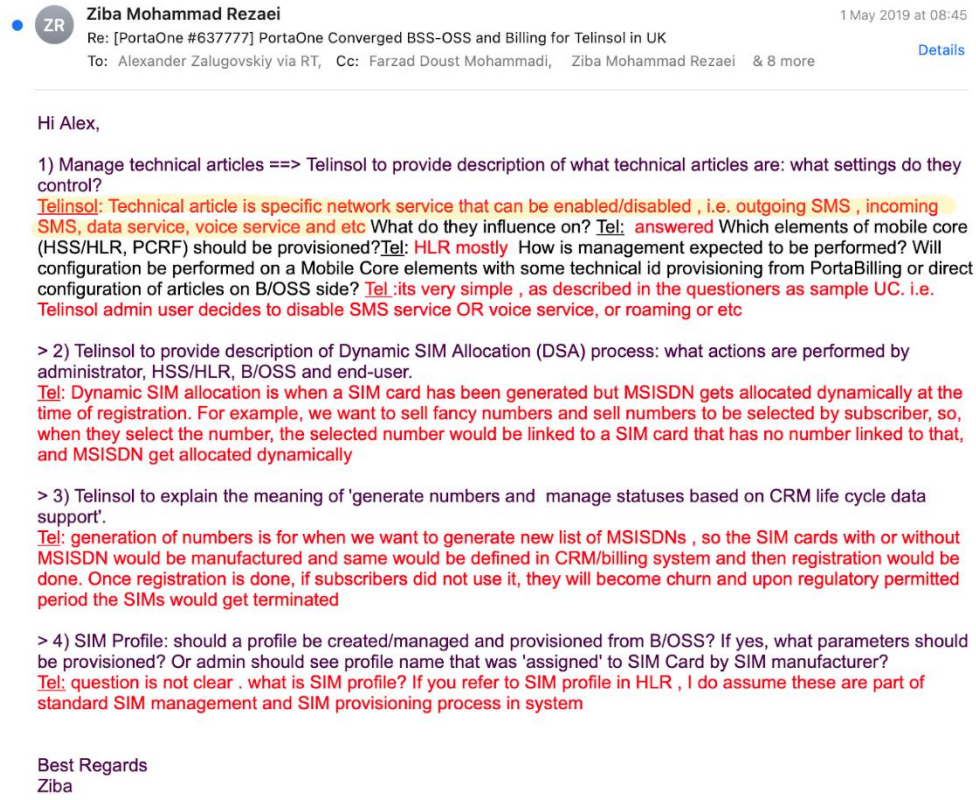
ببخشید که با تاخیر جواب میدم.

اگه درست متوجه شده هاشم شما درخواست دارید که اپل ای دی جدیدی برایتان فعال شود که بتونین که شماره موبایل هم دسترسی داشته باشین؟

لطفا با من تماس بگیرید تا چند تا مورد رو با هم در این خصوص چک کنیم.

ارادتمند
نیما اسکندری

Image 11



Ziba Mohammad Rezaei 1 May 2019 at 08:45

Re: [PortaOne #637777] PortaOne Converged BSS-OSS and Billing for Telinsol in UK

To: Alexander Zalugovskiy via RT, Cc: Farzad Doust Mohammadi, Ziba Mohammad Rezaei & 8 more Details

Hi Alex,

1) Manage technical articles ==> Telinsol to provide description of what technical articles are: what settings do they control?
Telinsol: Technical article is specific network service that can be enabled/disabled , i.e. outgoing SMS , incoming SMS, data service, voice service and etc What do they influence on? Tel: answered Which elements of mobile core (HSS/HLR, PCRF) should be provisioned?Tel: HLR mostly How is management expected to be performed? Will configuration be performed on a Mobile Core elements with some technical id provisioning from PortaBilling or direct configuration of articles on B/OSS side? Tel :its very simple , as described in the questioners as sample UC. i.e. Telinsol admin user decides to disable SMS service OR voice service, or roaming or etc

> 2) Telinsol to provide description of Dynamic SIM Allocation (DSA) process: what actions are performed by administrator, HSS/HLR, B/OSS and end-user.
Tel: Dynamic SIM allocation is when a SIM card has been generated but MSISDN gets allocated dynamically at the time of registration. For example, we want to sell fancy numbers and sell numbers to be selected by subscriber, so, when they select the number, the selected number would be linked to a SIM card that has no number linked to that, and MSISDN get allocated dynamically

> 3) Telinsol to explain the meaning of 'generate numbers and manage statuses based on CRM life cycle data support'.
Tel: generation of numbers is for when we want to generate new list of MSISDNs , so the SIM cards with or without MSISDN would be manufactured and same would be defined in CRM/billing system and then registration would be done. Once registration is done, if subscribers did not use it, they will become churn and upon regulatory permitted period the SIMs would get terminated

> 4) SIM Profile: should a profile be created/managed and provisioned from B/OSS? If yes, what parameters should be provisioned? Or admin should see profile name that was 'assigned' to SIM Card by SIM manufacturer?
Tel: question is not clear . what is SIM profile? If you refer to SIM profile in HLR , I do assume these are part of standard SIM management and SIM provisioning process in system

Best Regards
Ziba

Image 12

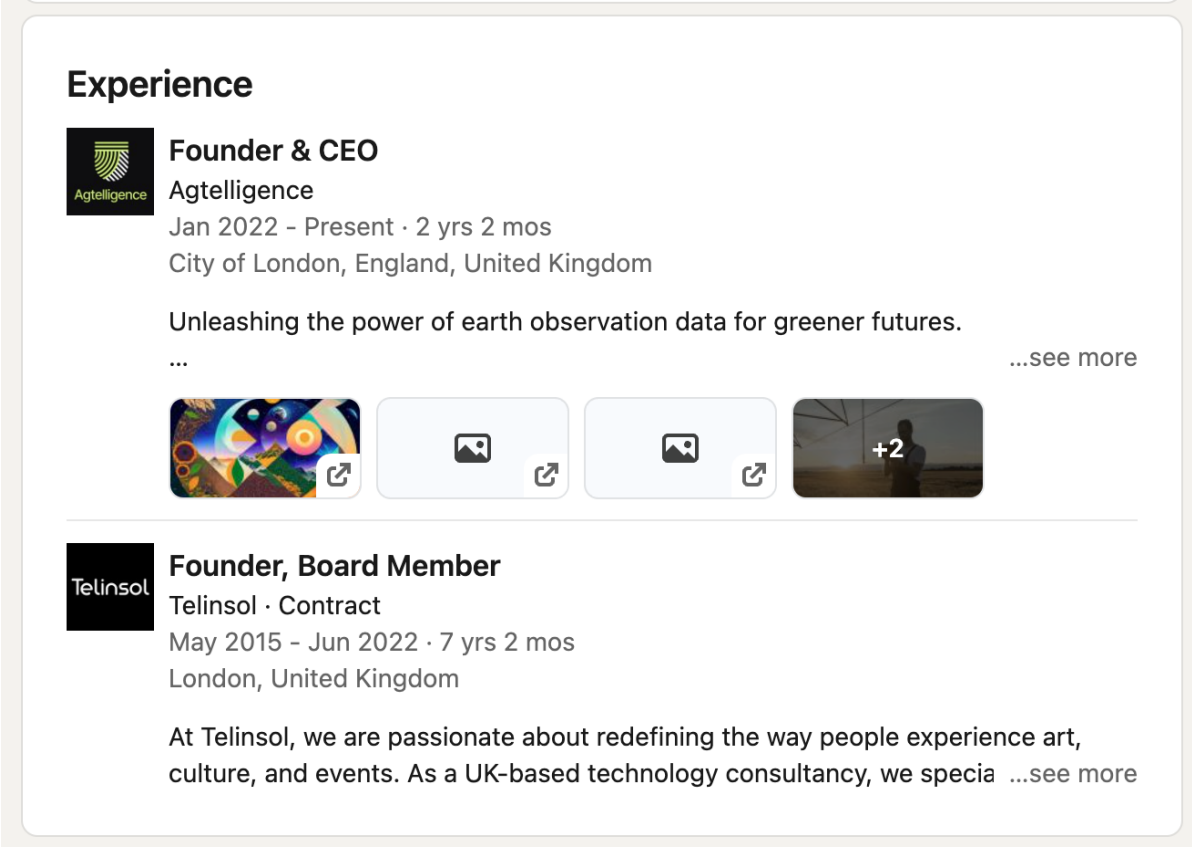

Experience
Agtelligence
Founder & CEO
Agtelligence
Jan 2022 - Present · 2 yrs 2 mos
City of London, England, United Kingdom
Unleashing the power of earth observation data for greener futures.
...
...see more
+2
Telinsol
Founder, Board Member
Telinsol · Contract
May 2015 - Jun 2022 · 7 yrs 2 mos
London, United Kingdom
At Telinsol, we are passionate about redefining the way people experience art, culture, and events. As a UK-based technology consultancy, we specia
...see more

Image 13

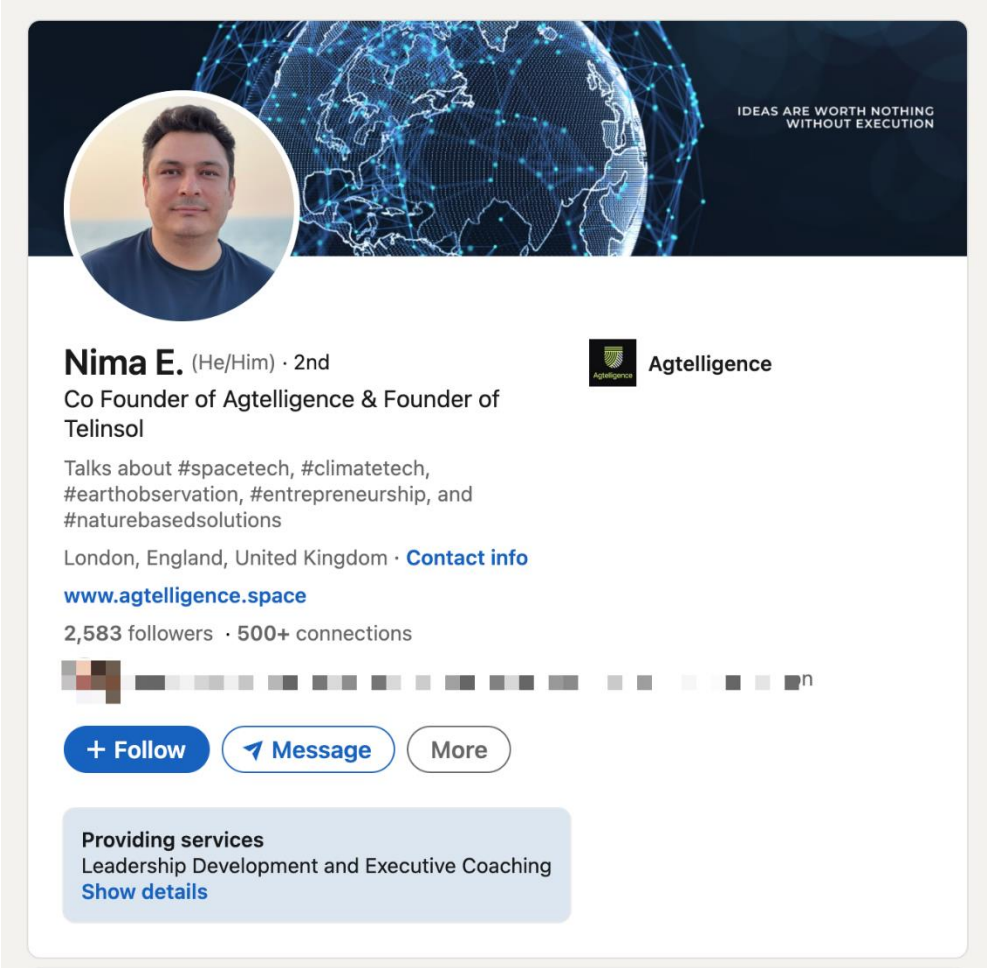


Image 14

B. Files

The following files are attached to this dossier:

- File 1 - Telinsol & ArianTel QU0041.pdf
- File 2 - Apple ID ArianTel.docx
- File 3 - Telinsol Technical Support.xslx
- File 4 - Telinsol Payment APIs.pdf

C. Organizations Details

Organization Name	**Nature of the Business and Brief Background**

ArianTel (ariantel.ir)	Established in 2016, ArianTel is an Iranian-based Mobile Virtual Network Operator (MVNO). ArianTel is one of the mobile providers to Iranians in the country and based on the leaked documents, one of the developers of SIAM, the surveillance technology that Iran's regime has been using against dissidents in Iran.
Tenisol Ltd. (telinsol.co.uk)	Established in 2015 by Nima Eskandari, is a UK-based satellite communications consultancy that is active in satellite telecommunications and a supplier of technology and software in mobile and satellite telecommunications. According to the leaked emails, Tenisol has conducted international business transactions with vendors on behalf of ArianTel and acted as a front company of ArianTel.
Emeatra Ltd.	Established in 2018 by Nima Eskandari, is a UK-based telecommunication, audio, and video equipment supplier. Although its website is not available anymore, it is an active company and it probably provides the same service, that Tenisol has been doing, to Iran's regime.
Agtelligence Ltd.	Established in 2021 by Nima Eskandari, is a UK-based tech agriculture company that uses satellite data to improve the sustainability in farming. Eskandari has been using this company to whitewash his name on the internet and also this company has received funding from the UK government.
PROTEI Ltd. (protei.ru)	Established in 2002, is a Russian company specializing in telecommunications, software, and hardware. It operates across Eastern Europe, Asia, Latin America, North Africa, and the Middle East. PROTEI has also provided services to the Russian government and its ministries and entities such as the Ministry of Defence and the National Defence Management Centre.
PortaOne Inc. (portaone.com)	Established in 2001, is a Canadian telecom company that offers software solutions for telecom companies, such as billing platforms (PortaBilling) and systems for managing and delivering services like voice, messaging, IoT/M2M, and data traffic (PortaSwitch), among others.