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Contribution by Iran (Islamic Republic of)

POSITION OF THE ISLAMIC REPUBLIC OF IRAN AND REQUEST CONCERNING IMPLEMENTATION OF RESOLUTION 1436 (C26)

Purpose

This document presents a letter expressing the position of the Islamic Republic of Iran concerning the implementation of Council Resolution 1436 (C26).

Action required by the Council

This document is transmitted to the Council **for information**.

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References

Council Resolution 1436 (C26); *Interim report on Resolution 1436*

جمهوری اسلامی ایران
Islamic Republic of Iran
وزارت ارتباطات و فناوری اطلاعات
Ministry of Information & Communications Technology

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Secretary-General
International Telecommunication Union
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Ref:
Date: 1 November 2026

Subject: Council Resolution 1436 (2026) (Document C26/130-E): Position of the Islamic Republic of Iran and Request Concerning Implementation

Excellency,

I have the honour to refer to Council Resolution 1436 (2026) (Document C26/130-E), and in particular to *instructs the Secretary-General* No. 2, under which a report including a damage assessment is to be submitted to the Council meeting of 7 November 2026 and to the Plenipotentiary Conference. I also refer to my statement at the fourth Plenary meeting of the Council on 1 May 2026, summarized in paragraph 2.2 of Document C26/121 concerning attacks on the telecommunication and broadcasting infrastructure of the Islamic Republic of Iran.

The Islamic Republic of Iran attaches the highest importance to the protection, resilience and continuity of civilian telecommunication/ICT services. That commitment rests on Article 1 of the Constitution, on Resolutions 130 and 136 (Rev. Bucharest, 2022), and on the Statement adopted by WTDC-25 on safeguarding public telecommunication networks and services during armed conflicts and disasters. These principles apply equally to all Member States. The Islamic Republic of Iran does not object to a technical assessment of damage to telecommunication infrastructure in any Member State, or to assistance for affected Member States.

The technical assessment of damage to communications infrastructure should serve not merely a fact-finding purpose, but also the broader objectives of the establishment of lasting peace and security. However, sustainable peace can only be founded upon justice, impartiality, and the consistent application of international law. It is neither equitable nor legally defensible to assess damage sustained by other States while disregarding the extensive damage inflicted upon the communications infrastructure of the Islamic Republic of Iran. Focusing exclusively on the technical consequences of the Islamic Republic of Iran's exercise of its inherent right of self-defence, while overlooking the damage to our communication infrastructure caused by the aggression itself, distorts the factual and legal context. There is no doubt that such an engagement undermines institutional impartiality. A credible assessment must therefore address the full scope of technical damage, including that resulting from the acts of aggression, with due regard to relevant findings. Only a comprehensive and impartial approach can advance accountability and contribute to a just and durable peace.

As stated before, documents submitted to the Council contained claims that did not appear to be supported by verifiable factual, legal or technical evidence. The Islamic Republic of Iran rejects the characterization in the preambular paragraph beginning *condemning*, which refers to "widespread unlawful targeting by Iran of civilian objects, including telecommunication services and submarine cables". The Islamic Republic of Iran is not a member of the Council and did not take part in the decision. The paragraph is preambular; it makes no determination and rests on no finding. Council resolutions are not instruments of the Union (Constitution, No. 29), and the Council acts within the powers delegated to it by the Plenipotentiary Conference (No. 68). The paragraph therefore constitutes no finding of fact or of law by the Union, and it creates no obligation for any Member State.

The drafting history confirms this reading. Between the original contribution (Document C26/95, 14 April 2026) and its second revision (Document C26/95(Rev.2), 30 April 2026), which the Council adopted:

- Every reference to "Iranian attacks" in the operative paragraphs was replaced by "those attacks";
- "incompatible with the obligations of Member States under the ITU Constitution and Convention" was replaced by "in a manner that contradicts the ITU Constitution and Convention";
- The recital of Human Rights Council resolution 61/1 was deleted, and the recital of Security Council resolution 2817 (2026) was shortened; and
- All references to one of the five States originally named were withdrawn.

Introducing the revised text on behalf of the co-sponsors, the councillor of the United Arab Emirates referred to "the technical nature of the draft resolution" (C26/121, para 1.1). One co-sponsor explained that the draft had been revised "to remove language that could be considered to politicize the contribution" (para 1.2). Councillors emphasized "the importance of neutrality and the need to protect the technical and inclusive nature of the Union" (para 1.3). The Islamic Republic of Iran asks that the resolution be implemented as the technical instrument its sponsors described. In particular, the operative paragraphs were deliberately worded not to attribute responsibility, and the report should not do so.

The factual statements in the contribution to which the draft resolution was annexed are those of its sponsors. The summary record of the meeting at which the resolution was adopted records no examination of any of them. The only incident that contribution dates is a pair of strikes on a submarine cable landing station in one State; it alleges no damage to any submarine cable itself. Its statements on

cyber operations rest on commercial threat-intelligence publications. The resolution itself identifies no incident, date, location, facility, cable system, source or methodology.

The Union may properly express concern about damage to the telecommunication infrastructure of any Member State and mobilize assistance. Characterizing specific conduct in armed conflict as unlawful is a different matter. It requires, at a minimum, identification of each incident, evidence of its circumstances, application of the relevant rules of international law, and an opportunity for the State concerned to be heard. That an installation was damaged does not establish that it was the object of an attack, that it was a civilian object at the time, or that any attack was unlawful. None of these steps was taken. Questions between Member States concerning the interpretation or application of the Union's instruments are governed by Article 56 of the Constitution.

The resolution recalls Nos. 186 and 197 of the Constitution and refers to conduct that "contradicts the ITU Constitution and Convention". No. 186 concerns each Member State's obligation to establish the channels and installations necessary for international telecommunications. No. 188 relates the duty to safeguard them to installations within each State's jurisdiction, and No. 197 concerns harmful interference to radio services. The Islamic Republic of Iran requests clarification of which provisions were considered to be contradicted, and in what respect.

The record itself shows why a State-specific, evidence-based assessment is needed. The original contribution alleged strikes on ICT infrastructure in Qatar, and those allegations were withdrawn in Rev.1. The host country's assessment of 18 August 2026 (Document C26-EXT/5-E, paragraphs 1, 5 and 6) reports that all attacks on its territory were directed at United States military facilities, that no civilian areas were targeted, and that the only disruptions were to LNG exports and a temporary closure of

airspace. The Islamic Republic of Iran refers to these documents not to address the situation of any other State, but to show that general characterizations cannot substitute for incident-specific assessment.

In view of the above, and consistent with the international character of the Secretariat (Constitution, Nos. 150–151), the Islamic Republic of Iran respectfully requests that the report under *instructs the Secretary-General* No. 2:

- Be confined to the technical impact on telecommunication/ICT services, infrastructure and ITU programmes and activities, as provided in *resolves* 2;
- Consistent with the wording the Council adopted, refrain from attributing responsibility for any incident or characterizing any incident in legal terms;
- Identify the source of each item of information and describe the methodology used, distinguishing data verified by the Secretariat from information supplied by interested Member States;
- Give the Member States concerned, including the Islamic Republic of Iran, an opportunity to provide information and comment before the report is finalized; and
- Propose to the Council a defined period for the reporting mandate, which currently extends to "future meetings and conferences as appropriate".

The armed conflict which began on 28 February 2026 with strikes against the Islamic Republic of Iran by the United States and Israel also caused extensive damage to Iran's own telecommunication and broadcasting infrastructure. As reported in Document C26/86(Rev.1), preliminary assessments identified more than 30 satellite earth station complexes destroyed, more than 38 terrestrial broadcasting stations damaged with loss of service to more than 33 million people, and more than 20 microwave link systems rendered inoperable. Equipment replacement costs, excluding buildings, exceed USD 85 million. At the fourth Plenary meeting, a number of councillors condemned the attacks on Iran's telecommunication

infrastructure and supported technical assistance and capacity-building for the Islamic Republic of Iran (C26/121, para 2.4). No decision was taken on Document C26/86(Rev.1), for lack of consensus (paras 2.7–2.8).

The Islamic Republic of Iran's request for technical assistance does not depend on any finding of responsibility. It therefore requests the followings:

- that you bring this matter to the attention of the Council at its meeting of 7 November 2026;
- that the Secretariat assess the damage to Iran's infrastructure using the same methodology as the report under Resolution 1436; and
- that the Telecommunication Development Bureau consider assistance under existing mandates, including Resolution 34 of the Plenipotentiary Conference and Resolution 34 (Rev. Baku, 2025) of the World Telecommunication Development Conference.

Document C26/86(Rev.1) also reported harmful interference to Iran's satellite broadcasting, including the unauthorized insertion of content, and unauthorized medium-wave emissions directed at its territory from outside it. These were reported to the Radiocommunication Bureau on the forms in Appendices 9 and 10 of the Radio Regulations without effective resolution. These matters fall squarely within Article 45 of the Constitution and the Radio Regulations. The Islamic Republic of Iran requests that the Radiocommunication Bureau give them priority and report on the action taken.

The Islamic Republic of Iran did not agree to Resolution 1436. It does not accept that the resolution, or any report prepared under it, may be relied on as practice establishing the interpretation of the Constitution or the Convention.

جمهوری اسلامی ایران
Islamic Republic of Iran
وزارت ارتباطات و فناوری اطلاعات
Ministry of Information & Communications Technology

The Islamic Republic of Iran reserves all its rights under the Constitution and Convention of the Union and under international law, including with respect to reparation for damage to its infrastructure, and reserves its position at the Plenipotentiary Conference.

I should be grateful if this letter could be circulated as a document of the Council for its meeting of 7 November 2026 and as an information document to the Plenipotentiary Conference.

Please accept, Your Excellency, the assurances of our highest Consideration.

Sincerely,

Seyed Sattar Hashemi

Minister of Information and Communications Technology
Islamic Republic of Iran