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**VIA E-MAIL**

Peter Micek  
General Counsel  
Access Now  
New York, NY

Dear Peter:

Thank you for your letter to AT&T dated September 12 and relating to the Corporate Accountability Index published by Ranking Digital Rights. We welcome the opportunity to discuss AT&T's commitment to respecting human rights in the digital age.

AT&T was pleased to receive the second-highest combined ranking among telecommunications companies in the 2018 Corporate Accountability Index. As your letter notes, we improved on our performance in last year's ranking. We also achieved the highest privacy ranking in our industry sector for the third consecutive ranking cycle.

AT&T's commitment to respect its users' freedom of expression and privacy rights is reflected in our [Human Rights in Communication Policy](#), our [Privacy Policy](#), our semi-annual [Transparency Report](#), and our internal governance structure. We report on our respect for [freedom of expression](#) and [privacy](#) through our human rights issue briefs. Our Human Rights Committee oversees these issues and is chaired by our Chief Sustainability Officer, under the direction of, and reporting to, our Public Policy and Corporate Reputation Board committee.

We also conduct due diligence in support of our commitment to human rights. In 2017, independent consultants concluded a broad-ranging human rights impact assessment of the operations of two Mexican wireless companies that we had previously acquired. We have worked to incorporate the recommendations of this process into our governance structure and internal procedures. AT&T also regularly performs privacy impact assessments when we consider launching new products and services.

Last month, as part of our ongoing human rights commitment, we hosted a training session on business and human rights at our Mexico office, conducted by Global Partners Digital, an international non-governmental organization focusing on digital rights.

We welcome the opportunity to address your suggestions related to the annual Ranking Digital Rights report. Your letter set forth three main suggestions, which we address individually below.

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### **Join the Global Network Initiative.**

We believe there are different means by which responsible companies can realize their commitment to human rights. AT&T has chosen not to join the GNI, but we continue to monitor developments as the former members of the Telecommunications Industry Dialogue move forward with membership in that organization. We concluded that independently implementing and reporting our progress on human rights issues was the best course for AT&T for the time being. We have been guided in that regard by the excellent work that the Telecommunications Industry Dialogue performed on a variety of topics, as well as the extensive learning that we gained during the Industry Dialogue's cooperative arrangement with the GNI from 2013 to 2017. We have great respect for the organizations involved in the GNI and for their shared mission. We look forward to continued engagement with them and beneficial exchange of ideas in the future.

Also relevant here, AT&T regularly engages with experts and civil society organizations dedicated to advancing digital rights, and we welcome input from these organizations on how we can improve our policies and practices related to freedom of expression and privacy. We are members of the Freedom Online Coalition's Advisory Network, and we find RightsCon to be a valuable opportunity to engage with experts from around the world. We interact regularly with the Center for Democracy and Technology on issues of privacy and free expression. We also participate in Business for Social Responsibility's Human Rights Working Group and GeSI's Human Rights Committee, through which we share best practices with companies representing a variety of sectors.

### **Disclose More Information about the Handling of User Information.**

AT&T's [Privacy Policy](#) describes in plain language the data we collect and how we use it. AT&T was one of the first companies to adopt a simpler, plain-language privacy policy. Our issue brief on [Protecting Privacy](#) also contains information about our collection and use of consumer data.

Additionally, AT&T puts customers in control of their data and how we contact them through an extensive set of consent choices on our [Your Rights & Choices](#) dedicated webpage.

### **Clearly Communicate Security Practices and Disclose Method for Handling Data Breaches.**

AT&T has established technical, administrative and operational safeguards that are designed to make the information we collect and use secure. We safeguard data using a variety of approaches such as encryption, anonymization and other security controls. We also secure our network and limit access to customer information within the company to those who have a business need to know. In addition, privacy and security trainings are provided as required or recommended, and such training is offered persistently throughout the year via AT&T internal websites.

Despite our best efforts, there are occasions when unauthorized parties gain access to our customers' information. In partnership with stakeholders such as the AT&T Chief Security Office, the Corporate Compliance Office provides consistent oversight, investigation, guidance and reporting of privacy incidents. The AT&T Privacy Incident Response Team follows a carefully designed governance structure and response process to these incidents, investigating and ensuring that any necessary remediation, reporting or notification is handled in accordance with the AT&T incident-response protocol. We also comply with data breach notification requirements in every state, federal regulations, and any applicable laws and regulations in other countries where we operate. This information is available in our [Protecting Privacy issue brief](#).

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Thank you for the opportunity to respond to the issues you raised. Please let us know if you have any additional questions or concerns.

Very truly yours,

*Jeff Dygert*

Jeffrey H. Dygert  
Executive Director, Public Policy