



June 1, 2016

AT&T
208 S. Akard St.
Dallas, TX 75202

Dear Randall L. Stephenson,

We are writing to you in your role as Chairman and CEO to seek further engagement with AT&T about the results of the [Ranking Digital Rights Corporate Accountability Index](#). The Index ranked 16 of the world's leading internet and telecommunications companies on their publicly disclosed policies and practices with respect to privacy and freedom of expression online. As you are likely aware, the sector-wide results were disappointing. Several companies performed poorly on objective indicators that measure adherence to best practices for reporting and transparency.

AT&T performed measurably better than most. Yet we are writing publicly to all companies that were ranked in order to further motivate sector-wide improvement. Drawing upon the results of the Index, we have prioritized recommendations to each company to pick off the "low-hanging fruit" that could improve your ranking in future releases of the Index.

We do not need to tell you the importance of respecting digital rights. You know that addressing human rights challenges in an accountable and transparent manner is good for business, and that your company's health and wealth depend on the trust of your customers.

Investors, too, require accurate and meaningful data on your firm's performance -- financial and otherwise -- to show why they should continue to commit to your growth. Policymakers seeking to protect their constituents' interests look to you for clear statements and policies to verify that you are complying with laws and norms. Despite laudable efforts by companies that ranked near the top of the Index, users remain in the dark about many company practices impacting their human rights, which is a key reason we are pushing even companies that performed relatively well in the Index to make further improvements.

Positively, AT&T's privacy disclosures scored the highest of all telecommunications companies, primarily due to the fact that yours is the only telco in the Index to include actual numbers of requests for every country in its transparency reports. Moreover, AT&T leads all companies, including Internet companies, in clearly explaining your process for dealing with government requests for user data. Your governance structure for supporting freedom of expression and privacy is generally strong.

To extend its leadership, we recommend that AT&T take these specific steps:

- Implement comprehensive human rights impact assessments, covering both free expression and privacy risks, including those risks users may face in the United States, Mexico, and any other markets into which you are evaluating entry.
- Ensure that your institutionalized commitments on privacy are matched by commitments on free expression issues. Free expression concerns are relevant for your U.S. customers as well as other markets.
- Clearly communicate with your users about data retention policies, in the same way as you have published communications to legislators (such as a 2013 letter to Senator Markey on the issue).
- Improve the manner and extent to which users can access and download information that you hold about them.
- Articulate specific ways that users can communicate freedom of expression or privacy-related grievances to the company and see those grievances addressed.

In some cases, laws restrict what companies can tell their customers. But the steps recommended above *do not* require a new law before a company can execute them. Your company can raise your score in the Index by taking these steps, implementing other recommendations identified in the Index, and by addressing sector-wide challenges through joining the Global Network Initiative. By doing so, you would distinguish your company as a sector leader, and earn a reputation among your customers as a defender of their human rights.

We commend your corporate officers for engaging with our staff, members of the Ranking Digital Rights research team, and other advocacy groups in private conversations about ways in which your company might improve policies and disclosures around freedom of expression and privacy. However we also believe that it is important to communicate with the broader community of users and global stakeholders. As a first step, we urge you to respond in writing to this letter and the recommendations we highlight from the Corporate Accountability Index.

We are happy to speak with you about your results and work with you in developing a response.

Sincerely,



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