



12 September 2018

Randall L. Stephenson
Chief Executive Officer
AT&T Incorporation
208 South Akard St.
Dallas, Texas, 75202

Dear Mr. Stephenson,

Access Now is a global organization fighting to defend and extend human rights in the digital age, particularly for users most at risk. We are writing to draw your attention to your company's performance in the [2018 Ranking Digital Rights Corporate Accountability Index](#) and to invite you to offer a public response.

As you may be aware, the Index evaluated 22 of the world's leading internet, mobile, and telecommunications companies, including yours, and found that all companies could make significant improvements in disclosing policies and commitments that affect their users' rights to freedom of expression and privacy. AT&T's score was based on an evaluation of its disclosed policies for AT&T's pre-paid mobile, post-paid mobile, and fixed-line broadband services.

AT&T ranked second out of 10 companies in its category, and saw a 0.72% increase in its Index score from 2017. AT&T's score increase can be attributed to the company's clarification of its handling of network shutdown demands by governments, as well as its improved disclosure regarding the options users have to obtain the information the company holds about them. Likewise, the Index recognizes as a positive step AT&T's strengthened commitment to user privacy by disclosing how users can obtain the data that it holds on them. Additionally, the company was one of the three telecommunication companies that disclosed data on government requests to restrict content or user accounts.

However, the 2018 Index shows that AT&T can take significant steps to improve company policies and practices affecting users' privacy and freedom of expression rights. AT&T should give users greater control of their data as well as provide users with more information about the collection and sharing of their data and how long it retains their data. AT&T should also be more transparent about how the company's commitments to users' freedom of expression and privacy are institutionalized.

We would like to draw your attention to several concrete steps that your company can take to improve disclosure of policies affecting users' rights. We recognize that in some instances, legal obligations may prevent companies from disclosing certain types of information about specific policies and practices. However, the Ranking Digital Rights team has consulted with legal experts and identified steps that your company can take in the immediate future to improve disclosure within the current legal environment.



- AT&T should **join the Global Network Initiative (GNI)**, whose members not only make human rights commitments but also undergo independent assessments to verify whether they have implemented and institutionalized them.
- The company should **disclose more information about its handling of user information**. AT&T should clearly articulate its practices regarding the handling user information and give users more control over their own data.
- AT&T should **clearly communicate security practices** and disclose to users how it handles data breaches.

Transparency on these issues is not only important from a human rights perspective, but also key to ensuring user trust. Investors also depend on companies to be transparent about these issues to verify they are making sound choices that are encouraging user growth.

We encourage you and the relevant officers within your company to read through the Index findings and recommendations, and the [“report card” for your company](#) in particular, and develop a public response to the issues raised here. This is an opportunity to distinguish your company from others in the sector as a leader on these issues, and to demonstrate a commitment to your users to respect their rights. The full results and raw data can be found at: <https://rankingdigitalrights.org/index2018>. For your convenience I am also attaching PDFs of the full report as well as your company’s report card.

This letter will be published this week on the website of the Business and Human Rights Resource Centre, alongside letters to each of the other companies evaluated in the Index. Company responses will be published in a timely manner on the same website upon receipt. A similar set of letters and company responses were published in 2016, visible at: <https://business-humanrights.org/en/access-now-sends-digital-rights-demands-to-tech-and-telco-firms>

We encourage you to send a response for publication by September 26, 2018, to demonstrate to your users and stakeholders that your company is serious about upholding freedom of expression and privacy. Please send your letter via email to Peter Micek <peter@accessnow.org> with Ana Zbona <zbona@business-humanrights.org> in copy.

The Access Now team would be happy to speak with you about your results and provide feedback as you develop your response.

Sincerely,

Peter Micek
General Counsel, Access Now
peter@accessnow.org