



Zevin Asset Management, LLC  
PIONEERS IN SOCIALLY RESPONSIBLE INVESTING



September 17, 2012

Mr. Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: AT&T Inc. and Open Internet Rules

Dear Mr. Genachowski:

We are writing to express our concern that AT&T Inc.'s stated intention to require new data plans for some of its wireless customers may constitute a serious violation of the Commission's Open Internet Rules.

We refer specifically to the Company's recent announcement that iPhone users who wish to access Apple's popular FaceTime video application via AT&T's cellular network will be required to sign up for new and more expensive text-and-voice "shared" data plans.

We believe this new AT&T policy could violate the Commission's Open Internet Rules which require that mobile providers shall not "block applications that compete with the provider's voice or video telephony services."

We therefore request that the Commission initiate a review and investigation of AT&T's policies and practices with regard to FaceTime and any similar applications.

As widely diversified institutional investors, we believe the open and non-discriminatory architecture of the Internet is critical to the prosperity of America's economy and society. We endorse "network neutrality" principles that aim to ensure equal access and non-discriminatory treatment for all content.

And we are greatly encouraged that both you and President Obama have noted that an open Internet plays a pivotal role in solving critical national problems such as healthcare, education, energy, and public safety and is necessary "to preserve the freedom and openness that have allowed the Internet to become a transformative and powerful platform for speech and expression."

Importantly, open Internet policies for wireless networks - the fastest growing segment of the Internet - have particular significance for minority and economically disadvantaged communities, which access the Internet via cell phones at a much greater rate than other groups.

Open Internet policies, we believe, are important to the reputation and financial health of telecommunications companies such as AT&T which provide access to the Internet for millions of Americans. If a company is perceived as inhibiting consumer choice or industry innovation it could suffer defections from its subscriber

base. A commitment to network neutrality also encourages application developers to bring new products to the ISPs' platforms, attracting new customers and opportunities to share revenue with developers.

As investors, we believe it is essential for the Commission to have a strong and clear position on network neutrality because regulatory uncertainty or ambiguity in this context creates an unhealthy investment climate.

Further, unchallenged violations of the Commission's Open Internet Rules could signal the beginning of a dangerous new phase in U.S. communications policy, one that would be ultimately harmful to innovation and the American economy.

A review and investigation of AT&T's policies and practices with regard to FaceTime, we believe, is necessary to ensure that the Company is in compliance with the Commission's rules. Such an investigation would also reassure investors and other stakeholders of the Commission's commitment to enforce the Open Internet Rules broadly across the telecommunications industry.

We thank you in advance for your consideration in this matter. Should you have any questions or require more information from us, please contact Mr. Jonas Kron, Vice President, Trillium Asset Management, at [jkron@trilliuminvest.com](mailto:jkron@trilliuminvest.com).

Sincerely yours,

Jonas Kron  
Vice President, Director of Shareholder Advocacy  
Trillium Asset Management Corp.

Julie Fox Gorte, Ph.D  
Senior Vice President for Sustainable Investing  
Pax World Management Corp.

Laura Campos  
Director of Shareholder Activities  
Nathan Cummings Foundation

Jon M. Jensen  
Executive Director  
Park Foundation

Sonia Kowal  
Director of Socially Responsible Investing  
Zevin Asset Management, LLC