

**AT&T California Response to Questions July 18 2023 from T-Mobile and Verizon Wireless
about AT&T Database Required by CPUC Decision 21-10-019**

1. Please describe how access to the pole database will be limited to each of the following categories of authorized users:

- Major Pole Owners
- Pole Attachers
- California state and local government officials
- Commission staff

AT&T Response: Every request to access the AT&T Facility Portal will be vetted by a group within AT&T that is familiar with the type of user. More specifically, the following users will be reviewed by the following groups within AT&T:

- Major Pole Owners: AT&T Joint Pole Team
- Pole Attachers: AT&T Structure Access Team
- California state and local government officials: AT&T External Affairs Team
- Commission staff: AT&T External Affairs Team

2. Please describe which of the following are incorporated into your database:

- Role-Based Access Control for all users
- Secure application/registration processes
- Confirmation of valid business email address
- Confirmation of existing nondisclosure agreement
- Assign unique usernames
- Use of passwords
- 2-factor authentication processes
- Periodic review of authorized user lists and closure of inactive accounts or accounts that are no longer valid

AT&T Response: AT&T specifies below which of the features are currently planned to be included in the AT&T Facility Portal:

- Role-Based Access Control for all users: Yes
- Secure application/registration processes: Yes
- Confirmation of valid business email address: Yes
- Confirmation of existing nondisclosure agreement: Existing nondisclosure agreements remain in place. AT&T does not plan at this time to condition access to the AT&T Facility Portal on the existence of a nondisclosure agreement.
- Assign unique usernames: Yes. The current plan is to use email addresses as usernames.
- Use of passwords: Yes.
- 2-factor authentication processes: AT&T does not plan at this time to require 2-factor authentication.
- Periodic review of authorized user lists and closure of inactive accounts or accounts that are no longer valid. Yes.

3. Please describe how your pole database ensures that authorized users:

- Register with the pole owner;
- Provide advance written identification of the purpose for receiving access to the pole; and
- Identify any other entity/person, if any, with whom the requesting party intends to share the Pole Database Information.

AT&T Response: As described in response to Question 1, requests to access the AT&T Facility Portal will be reviewed by AT&T personnel to verify that the person requesting access is an authorized user. Each authorized user will be required to sign an access agreement, which will only authorize access by the signatory.

4. Please describe what will constitute a legitimate purpose for receiving access to the pole database for each of the authorized user groups identified above in Item 1.

AT&T Response: For each of the user groups identified in Question 1, AT&T responds as follows:

- Major Pole Owners: Major Pole Owners will be required to confirm that access is for the purpose of properly planning for, managing, and maintaining poles; compliance with Commission requirements; or another legitimate business purpose.
- Pole Attachers: Pole Attachers will be required to have an active structure access agreement with AT&T that allows the attacher to have access to AT&T records. Pole Attachers will also be required to confirm that access is for the purpose of properly planning for, managing, and maintaining attachments; compliance with Commission requirements; or another legitimate business purpose.
- California state and local government officials: California state and local government officials will be required to confirm that access is for a legitimate governmental purpose.
- Commission staff: Commission staff will be required to confirm that access is for a legitimate regulatory purpose.

5. Please describe what database controls and protective measures will be in place to prevent pole owner/pole attacher personnel associated with marketing, sales or strategic planning - or any other individuals without a “legitimate purpose” - from accessing another pole attacher’s information.

AT&T Response: As described above, Major Pole Owners and Pole Attachers will be required to confirm that access is for the purpose of properly planning for, managing, and maintaining poles/attachments; compliance with Commission requirements; or another legitimate business purpose. AT&T does not consider marketing, sales, or market entry decisions to be legitimate business purposes for access to pole attachment data. Prior to gaining access, authorized users will be required to sign an access agreement specifying the access is for legitimate business purposes, which excludes marketing, sales and market entry decisions.

6. Please describe any processes you have in place, or plan to have in place, to notify pole attachers if you believe there has been a breach of the database.

AT&T Response: If AT&T discovers that a party has obtained unauthorized access to Attacher's data during a security breach of AT&T's network and/or data storage facilities, AT&T will promptly conduct an investigation to determine when, and if possible, how the breach occurred, and will notify the Attacher of such breach. AT&T will reasonably assist Attacher in investigating and assessing the extent and nature of the breach and will reasonably inform Attacher of the progress of AT&T's investigation and its remediation and prevention efforts.

7. Please describe what, if any, limits will be placed on the type or scope of information (e.g., pole attacher name) that can be accessed by authorized users from the database.

AT&T Response: At this time, AT&T does not plan to place limits on the type or scope of information that can be accessed by authorized users.