

AT&T Mobility Substance Abuse Policy

1. BASIS FOR THE POLICY

- 1.1. AT&T is committed to protecting the safety, health, and well being of its employees and all people who come in contact with its workplace(s) and property.
- 1.2. Recognizing that drug and alcohol abuse pose a direct and significant threat to this goal and to the goal of a productive and efficient working environment in which all employees have an opportunity to reach their full potential, AT&T is committed to assuring a drug-free working environment for all of its employees.

2. POLICY

- 2.1. AT&T strictly prohibits the unlawful use, abuse, possession, sale, attempted sale, conveyance, distribution, or manufacture of illegal drugs or controlled substances, including inhalants while engaged in any company activity, on company premises, or in company vehicles. Employees are forbidden from reporting to work, driving on company business or driving a corporate vehicle while under the influence of alcohol or any illegal drug. Employees may not drink alcoholic beverages while on any company premises or engaged in any corporate activity except when permitted at a company-sanctioned event. The specific Guidelines pertaining to AT&T Mobility are set out below, and employees should carefully review the Guidelines that pertain to them.

3. NOTIFICATION OF CHARGES OF ILLEGAL DRUG/ALCOHOL ACTIVITY

- 3.1. Employees must abide by the terms of the policy and, consistent with the Code of Business Conduct, notify their supervisor as soon as possible if they are charged with criminal offenses involving the manufacture, use, possession, sale, attempted sale, conveyance, or distribution of illegal drugs or controlled substances, or with motor vehicle violations related to alcohol/drug use. Depending on the criminal offense, the results of management's own investigation, and/or legal judgment or disposition, as may be determined appropriate by management, the employee shall be subject to discipline up to and including dismissal.
- 3.2. Under the terms of the federal Drug-Free Workplace Act, as a condition of employment, employees must abide by the terms of the policy and notify their immediate supervisor if they are convicted of a violation of a criminal drug statute where the violation occurred in the workplace within five days following the conviction.

4. REQUIRED NOTICE OF PRESCRIPTION OR OVER-THE-COUNTER DRUG USE

- 4.1. For the safety of others and themselves, employees should not operate any machinery, motor vehicles, or engage in any hazardous physical activity while under the influence of any type of medication that could impair a person's physical motor skills or judgment.
- 4.2. In order to promote a safe and efficient work environment, employees in jobs requiring the operation of a motor vehicle or other potentially dangerous machinery or equipment, or whose jobs require climbing ladders or poles, who are using prescription drugs or medication which may impair their ability to work safely, must inform their supervisor prior to their first work assignment after taking the drug or medication.

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Employees are not required to inform their supervisor of the type of medication or reason for taking the medication. Any such employee who fails to give notice as required in this paragraph, and who, while taking such medication, is involved in any on-duty incident causing personal injury or property damage, may be subject to disciplinary action up to and including dismissal.

5. DRUG AND ALCOHOL TESTING

5.1. Substance Abuse Testing at AT&T Mobility

5.1.1. Employees are subject to reasonable cause drug and alcohol testing initiated by their employing company under this policy, or initiated at the direction of a health care provider retained by the employing company to conduct any examination or evaluation of the employee's fitness for duty. Reasonable cause may be considered in such situations as verified threats of violence, personal injury accidents, motor vehicle accidents, unusual decline in job performance, and chronic absenteeism or tardiness. These examples are illustrative only and are not exhaustive. See section 11 for more information.

5.3. Testing Processes

5.3.1. Ten major drug classes are screened in each drug test. These are amphetamines, barbiturates, benzodiazepines, cannabinoids, cocaine, methadone, methaqualone, opiates, phencyclidine, and propoxyphene. Descriptive (and brand names) for drugs falling into these classifications are: Dexamphetamine (Dexedrine, Benzedrine), Methamphetamine (Methadrine), Amobarbital (Amytal), Butobarbital (Butisol), Pentobarbital (Nembutal), Phenobarbital (Luminal), Secobarbital (Seconal), Chlorazepate (Tranxene), Chlordiazepoxide (Librium), Diazepam (Valium), Flurazepan (Dalmene), Heroin, Marijuana, Cocaine, Dolophine, Quaalude, Hydromorphone (Dilaudid), Morphine, Oxycodone, PCP, and Darvon.

5.3.2. Drug testing is performed on urine specimens collected from employees and job applicants at health clinics, physician offices, and clinical laboratories selected by the Company. Specimens are transported to a contracted Federal Department of Health and Human Services approved testing facility for analysis. The Company will use only laboratories that are certified under appropriate federal and/or state regulations. The Enzyme Multiplied Immunoassay Test is the initial method used to detect drugs in the urine, and all presumptive positives are confirmed by the Gas Chromatography/Mass Spectrometry method. Only conclusive test results are to be used by the Company. A positive drug urinalysis and alcohol evidentiary breath test will be confirmed by a second test. Both the first and second tests must be positive or the results are considered inconclusive, thereby resulting in a negative report to the Company. Alcohol testing is performed by use of an Evidential Breath Test analyzer, which produces a measure of blood alcohol content.

5.3.3. Tampering with a urine specimen (adulteration or substitution of specimen) or consuming any substance in an attempt to deliberately alter test results will result in disciplinary action up to and including dismissal.

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5.3.4. Substance abuse testing processes will be the responsibility of the vendor's Medical Review Officer (MRO). The MRO will be the recipient of test results from the laboratory and will communicate these results to the appropriate parties.

5.4. Department of Transportation Drug Testing (see Addendum at http://worksafe.sbc.com/dot_regs.htm#)

5.5. Employees must sign consent and authorization forms (Attachment A) before they are tested for alcohol/drugs. Employees who refuse to sign the consent and authorization forms or participate in the testing process will be subject to discipline up to and including dismissal, consistent with relevant state and federal law.

6. EMPLOYEE ASSISTANCE

6.1. In support of its effort to maintain a drug-free workplace, the Company has taken the position that substance abuse is a treatable condition. AT&T, therefore, makes available to all employees a confidential Employee Assistance Program (EAP) whose ultimate goal is rehabilitation. This program is available at no cost to employees and includes initial assessment, referral, and supportive follow-up.

6.2. Voluntary self-referral to EAP and/or substance abuse treatment is considered to be a private matter for the employee.

6.3. An employee will not be disciplined solely because he/she voluntarily requests assistance through the EAP for a drug or alcohol abuse problem. However, seeking assistance or raising any claim related to drug or alcohol abuse does not relieve an employee of his/her responsibility to meet the Company's performance, safety or attendance standards; does not relieve an employee of his/her responsibility to adhere to this policy and to the AT&T Code of Business Conduct; and does not insulate the employee from discipline for reasons other than seeking assistance for a drug or alcohol abuse problem; nor will an ongoing investigation and subsequent discipline be halted as a result of an employee's voluntary request for assistance.

7. NEW HIRES

7.1. All new hires--and re-hires of regular full-time or part-time employees--are required to submit to a pre-employment drug test after extension of a conditional offer of employment. Failure to pass this drug test shall result in denial of employment, or in immediate dismissal if the employee has begun working before results of the drug test are received.

7.2. If an applicant is found to have falsified, substituted, or tampered with any sample of a body fluid associated with testing for substances, he/she will not be offered employment or if he/she has already been offered employment, he/she will be terminated.

7.3. Applicants whose final results are positive for substance abuse will not be allowed to reapply for employment or be offered employment at any affiliate of AT&T for a period of 12 months.

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8. CONFIDENTIALITY AND EMPLOYEE RIGHT TO KNOW

- 8.1. Test results generally are confidential and shall be kept in a separate file from the employee's regular personnel file unless they are used in any decision that supports any type of job actions, employment status, or other actions affecting employment, including discipline.
- 8.2. Employees have a right to review their own test results. Employees may address a written request for a copy of test results to Concorde, Inc, 1835 Market Street, 12th floor, Philadelphia, PA, 19103.

9. GENERAL RESPONSIBILITY AND APPLICABILITY

- 9.1. Substance abuse and prevention is everyone's responsibility. AT&T expects all of its employees to recognize and accept this responsibility and to do their part in assuring that working together we can achieve and maintain a drug-free working environment for all Company employees. This policy applies equally to all AT&T and affiliate personnel no matter what position or employment status. All AT&T employees are required to abide by the terms of this policy as a condition of employment. Violation of this policy may result in disciplinary action up to and including dismissal.
- 9.2. AT&T expects all supervisors to be knowledgeable of the Company's commitment to ensuring a drug-free working environment for all employees. This includes understanding the consequences of substance abuse and how to detect it in the workforce, recognizing the performance and behavior of their subordinates, and taking action when appropriate.
- 9.3. It is the supervisor's responsibility to assure that employees are covered on the Policy.
- 9.4. Where specified by a customer and determined appropriate by the Company, employees may also be required to be drug and/or alcohol free as a condition of employment with respect to the provision of services or products to such customer.

10. GENERAL GUIDELINES FOR IMPLEMENTATION AND ADMINISTRATION

- 10.1. Supervisors should consult with their immediate supervisor, department HR representative, medical advisor, and/or the Employee Assistance Program (EAP) in suspected substance abuse situations. In addition, before taking disciplinary action, managers in Human Resources, Labor Relations and your Legal department should be consulted.
- 10.2. Supervisory actions must be based on Company policies and practices.
 - 10.2.1. Contact Human Resources for assistance.
 - 10.2.2. Use the EAP as a professional resource. ValueOptions, the EAP vendor, may be reached at 1-800-554-6701. ValueOptions' Health and Performance Solutions EAP Consultants are available specifically to help managers address substance abuse and other employee-related issues in the workplace. They can be reached at the general EAP number mentioned above or directly at 866-697-4327.
 - 10.2.3. Treat recovering or known substance abusing employees fairly.

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- 10.2.4. Follow through with established disciplinary procedures if the employee fails to perform.
- 10.3. Contact Asset Protection if prohibited substances are suspected or discovered on Company property or in Company vehicles. Supervisors should confiscate any observed prohibited substances and keep them under close surveillance until Asset Protection arrives.
- 10.4. Asset Protection should be contacted if it is suspected that the sale, manufacture, or distribution of drugs is occurring on Company property or involves Company employees.

11. AT&T MOBILITY GUIDELINES

- 11.1. When signs of impairment or other unusual behaviors are noted, the incident should be handled as follows:
 - 11.1.1. Get a second observation from another management employee, if possible. (Both managers should document their observations.)
 - 11.1.2. Relieve the employee of his/her duties.
 - 11.1.3. Advise the employee of the supervisory observations and suspicions.
 - 11.1.4. Report the incident and documented observations to the next higher level of management available if the manager involved is below a third level manager.
 - 11.1.5. Advise the employee that a reasonable suspicion exists for a reasonable cause test. The employee should be reminded that the penalty for refusing the test is subject to discipline up to and including dismissal for insubordination.
 - 11.1.6. Have the employee sign the reasonable suspicion test consent form. Refusal to sign this form may result in discipline up to dismissal for insubordination.
 - 11.1.7. To schedule a reasonable cause test, call Concorde at 1-800-662-1676.
 - 11.1.8. Make arrangements to transport the employee to the nearest test facility.
 - 11.1.9. Provide transportation for the employee to his/her home. Do not allow the employee to drive.
- 11.2. If a supervisor notes poor job performance or other behaviors which might signify substance abuse, the following guidelines should be considered:
 - 11.2.1. Document job performance/behavioral problems.
 - 11.2.2. The supervisor may meet with the employee to develop a written improvement plan in poor performance situations.
 - 11.2.3. EAP may be suggested in poor performance situations.
 - 11.2.4. In poor performance situations, if employee performance fails to improve after a written improvement plan, if any, is put into effect and/or if the pattern or nature of job problems reasonably suggests that substance abuse may be a factor, consider a reasonable cause drug and alcohol test.
 - 11.2.5. In the case of incidents jeopardizing personal safety, where surrounding circumstances reasonably suggest that substance abuse may be a factor, a reasonable cause drug and alcohol test should be considered.
 - 11.2.6. Self-admission may be reasonable cause for a reasonable cause drug and alcohol test. Management has the discretion, based upon the circumstances of the Self-admission, to use this substance abuse policy and require that the employee follow the necessary action steps.

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- 11.2.7. Your HR representative, Labor Relations, and Legal should be consulted. If reasonable cause testing is approved, discuss the "triggering incident" with the employee. If reasonable cause testing is not approved, management must decide what other course of action is appropriate.
 - 11.2.8. Advise the employee that a reasonable cause test will be required. Remind the employee that the penalty for refusing to take a reasonable suspicion test may result in discipline up to dismissal for insubordination. Have the employee sign the reasonable suspicion consent form. Refusal to sign this form may also result in discipline up to dismissal.
 - 11.2.9. To arrange a reasonable cause test, call Concorde, Inc. at 1-800-662-1676.
 - 11.2.10. Transport the employee to the nearest reasonable cause drug and alcohol test facility unless you are using on-site testing procedures.
 - 11.2.11. Depending on the circumstances surrounding the "triggering incident," the employee may then be transported to his/her home, or may be returned to the work location.
- 11.3. The presence of alcohol in the body is more closely linked to a person's observed behavior, reaction time, thinking and judgment. Consequently, the presence of alcohol in the body is a good indication that an employee may be affected by the alcohol in performance of his/her job.

12. PROCEDURES FOR LAB TEST AND BILL PAYMENT

- 12.1. To schedule a reasonable cause drug and alcohol test, call Concorde, Inc., at 1-800-662-1676. The operator will ask the supervisor to provide the following information:
 - 12.1.1. Your name
 - 12.1.2. Company name
 - 12.1.3. Your telephone number, or where you can be reached in the next few minutes
 - 12.1.4. Your location (City, State)
 - 12.1.5. Does the employee(s) to be tested drive a truck in excess of 26,000 pounds?
 - 12.1.6. How many people need to be tested?
 - 12.1.7. Where do you want the test conducted--at a "clinic type" collection site or at a work location? (If work location, you must consult with Labor Relations and/or HR first.)
 - 12.1.8. If at work location, provide detailed directions
 - 12.1.9. Confirm that both drug and alcohol testing is to be performed
 - 12.1.10. Type of test:
 - 12.1.10.1. *Federal DOT*: 1) random, 2) post-accident, or 3) follow-up.
 - 12.1.10.2. *Non-Federal*: 1) reasonable cause or 2) follow-up.
 - 12.1.11. (Closest approved site will vary depending upon the tests being conducted. Not all collection sites will be equipped with EBT devices for alcohol tests. In some cases, Management may choose to have the tests performed at the work site. While this option is available, it should be noted it could cost in excess of \$300 to perform one test.)

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13. CONTACTS REGARDING POLICY MATTERS

- 13.1. For any additional information regarding this policy, please contact the Associate Director – EAP Consulting, at 203-771-5380.
- 13.2 Supervisors may call may call ValueOptions' Health and Performance Solutions at 866-697-4327 for guidance in handling employees with job performance/substance abuse issues.

ATTACHMENT A



CONSENT TO DRUG AND ALCOHOL TEST

I understand that pursuant to Company policy I am being requested to submit a specimen to be tested for alcohol and/or certain controlled substances. I have been advised that the test will be analyzed by a laboratory certified by SAMHSA and that the purpose of the analysis will be to determine whether certain levels of controlled substances and/or alcohol are present in the specimen provided.

I understand that if I refuse to sign this consent or if I do not complete the test as scheduled, disciplinary action, up to and including dismissal may be taken based upon supervisory observations, other evidence of impairment and/or any other permissible basis. I further understand that if the test result is positive, disciplinary action, up to and including termination of my employment may be taken.

With these understandings, I hereby consent to the drug and alcohol test.

Dated: _____

Employee's signature



**AUTHORIZATION FOR THE DISCLOSURE OF
PROTECTED HEALTH INFORMATION**

I, the undersigned, understand that pursuant to Company policy, I am being requested to submit a specimen to be tested for certain controlled substances and/or alcohol. I am informed that the test will be analyzed by a laboratory certified by SAMHSA and that the purpose of the analysis will be to determine whether certain levels of controlled drugs and/or alcohol are present in the specimen provided.

I hereby authorize the entity conducting this analysis to provide the results of this testing to a Medical Review Officer designated by the Company, who in turn is authorized to release the results to an authorized representative of the Company.

I understand that after this information is disclosed, federal law might not protect it from further use and/or disclosure. However, the Company agrees to keep all such information confidential and to use and/or disclose this information solely for the purposes of determining whether disciplinary action or other employment action is warranted. This information may also be used and/or disclosed with regard to any dispute which may arise as a result of any disciplinary or employment action taken and/or with regard to the testing, consent, or authorization.

I understand that I have the right to revoke this authorization at any time by submitting a revocation request in writing to (name and address of testing entity.) This revocation will be effective after receipt, review and processing, on a prospective basis only. I understand that if I fail to sign this authorization or revoke this authorization before the results of the test have been received by the Company, disciplinary action, up to and including dismissal, may be taken based upon supervisory observations, other evidence of impairment and/or any other permissible basis.

Absent my revocation, this authorization shall expire one year following the signature date stated below or 90 days following the final determination of any dispute relating to any disciplinary or other employment action or this authorization, whichever is later.

I understand that I have the right to request and receive a copy of this authorization. A photocopy of this authorization shall be valid and is to be accepted with the same effect as the original.

Dated: _____

Employee's Signature: _____

Employee's Name (Printed): _____

I have received a copy of this authorization_____ (Employee's Initials)

ATTACHMENT B

AT&T SUBSTANCE ABUSE POLICY COVERAGE FORM

Employee _____ Department _____

Acknowledgement

I have received the AT&T Substance Abuse Policy, and have had an opportunity to read and review it.

Employee Signature

Job Title

Date

EXHIBIT I

JOB RELATED PERFORMANCE/BEHAVIOR CONCERNS

Substance abuse may negatively impact employee job performance and behavior in either or both of two ways.

Employees may be under the influence of a prohibited substance such that their coordination, reactions, reliability, good judgment, and/or motor senses are impaired.

In other cases, an employee's job performance (quality, quantity, attendance) or job behavior (effectiveness with others, safety, adherence to Company policies) may suffer due to substance abuse. The intent of this Policy is to provide managers with the tools to make effective observations and to provide guidance for managers to take appropriate corrective action. The following should guide the supervisor in handling these two differing situations and/or persistent poor job performance/behavior.

Impairment

When observations suggest that an employee is impaired due to being under the influence of a prohibited substance, the supervisor's observations of the employee's behavior should be documented carefully. The following are some examples of such observations:

Eyes

- Unusually Bloodshot
- Glazed or Unfocused
- Dilated Pupils

Walking

- Unsteady Gait
- Swaying
- Staggering

Breath

- Odor of Alcohol

Behavior

- Violent
Argumentative
- Hyperactive
- Crying
- Sleepy
- Profane Speech
- Uncoordinated
- Threatening

Speech

- Slurred
- Incoherent
- Unusually Rapid or Unusually Slow
- Excessively Loud or Excessively Soft
- Rambling

Supervisors should be aware of any state guidelines established regarding impairment, and act consistently. Consult with Human Resources, Legal, and/or Labor Relations for information.

Refer to federal Department of Transportation guidelines regarding impairment when supervising employees operating company vehicles under a Commercial Driver's License ("CDL").

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Poor Performance/Behavior Situations

Substance abuse may negatively affect employee job performance/behavior gradually but persistently over time, such as chronic absenteeism and tardiness. Substance abuse may also cause incidents which jeopardize personal safety, such as threats of violence, personal injury accidents and motor vehicle accidents. The following are some behavioral, work pattern, and job performance signs which may suggest substance abuse. NOTE: A single event of poor performance (as opposed to an incident which jeopardizes personal safety), is generally not sufficient to suggest substance abuse. Several factors over a period of time may suggest substance abuse:

<p>Physical Signs</p> <ul style="list-style-type: none"> • Unusual Untidiness • Blank Stare • Sleepiness (nodding) • Changes in Appearance After Lunch/Break <p>Mood Changes</p> <ul style="list-style-type: none"> • Appears Depressed or Extremely Anxious • Irritable • Paranoid • Emotional Unsteadiness Such as Uncharacteristic Outbursts or Crying • Mood Changes After Lunch/Break <p>Overall Behavior</p> <ul style="list-style-type: none"> • Unusually Withdrawn or Uncharacteristically Talkative • Uncharacteristically Argumentative <p>Changing Work Patterns</p> <ul style="list-style-type: none"> • Inconsistency in Quality of Work and Productivity • Poor Judgment Resulting in Delays and Carelessness • Lack of Concentration • Incomplete Work, Missed Deadlines 	<p>Absenteeism</p> <ul style="list-style-type: none"> • Increased Absenteeism & Tardiness, especially Mondays, Fridays and before and after holidays • Frequent Unreported Absences, Later Explained as "Emergencies" • Frequent Use of Unscheduled Vacation Time • Leaving the Work Area More Than Necessary (Including Frequent Trips to Water Fountain and Rest Room) • Unexplained Disappearances From the Work Site • Frequent Requests to Leave Early <p>Relationship with Co-workers</p> <ul style="list-style-type: none"> • Overly Sensitive to Real or Imagined Criticism • Co-workers Complain of Employee's Behavior • Often Borrows Money From Co-workers • Frequently Complains about Personal Problems Such as Separation, Divorce, Child-Discipline <p>Accidents</p> <ul style="list-style-type: none"> • Unusual Number of Accidents
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EXHIBIT II

SUPERVISOR'S GUIDE FOR SUBSTANCE ABUSE CASES

Don't Deny - Be Aware

1. If you have an employee with a problem, then you have a problem.
2. Substance abuse will usually not go away. If you do nothing, your problems will increase.
3. Accept that drug or alcohol abuse is destructive to the individual, to the employees around him or her, to you, and to the Company.

Facts and Job Performance

1. Well-documented facts can help stop employee manipulation and denial that a problem exists.
2. Proof can help the employee recognize his/her problem.
3. See Exhibit I, above, regarding employee behaviors occurring as a result of substance abuse.

Documentation

When dealing with any employee performance problem, it is important that the supervisor document evidence of substandard behavior. The documentation process helps to define the problem and substantiate corrective action taken.

When observations suggest that poor performance is the result of a drug or alcohol abuse problem, documentation also provides supporting evidence that the abuser cannot ignore or deny. Denial is one symptom that is common to all abuse situations. Some drug or alcohol abusers will go to extreme measures to avoid facing the problem. Documentation of job performance problems may force the employee to deal with the situation.

A supervisor can ask himself/herself several questions to help in the documentation process:

1. What seems to be different in the employee's job performance?
2. Is the behavior affecting quantity and quality of work?

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3. How is the employee's behavior affecting customers and other employees' morale?

The following guidelines will help a supervisor collect the appropriate information:

1. When documenting a problem always focus on what happened.
2. Do not give opinions or report hearsay.
3. Record facts.
4. Think of yourself as a newspaper reporter. When writing a documentation report, ask the questions who, what, when, where, why and how. (Include an evaluation of attendance/tardy history where appropriate.)
5. Include what led up to the situation, and the results of the incident.
6. Write a summary of each incident in order to "paint the picture" clearly.
7. When reporting, be certain to focus on job performance.
8. Treat all documentation regarding the situation in a confidential manner.

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