

From: [Nikki Soukup](#)
To: [AGOPinionRequests](#)
Cc: [Lillian Gilmer](#); [Zaida Piccoro](#)
Subject: Request for AG Opinion: Telecommunication Fund for the Deaf
Date: Monday, August 24, 2026 7:01:49 PM

Dear Solicitor General Bendor,

In my official capacity as Executive Director of the Arizona Commission for the Deaf and the Hard of Hearing (ACDHH), I respectfully request an Attorney General Opinion regarding the Telecommunication Fund for the Deaf (refer to A.R.S. §§ 42-5251-5252) and the state's interpretation of "exchange access services."

An increasing number of public service corporations that provide "exchange access services" have modernized their service array to a la carte or bundled home telecommunication and telephone options. These often include services delivered through wired or wireless channels, including voice, digital, and cellular phone service, fiber optic, coaxial, ethernet, and DSL internet, and other alternatives to wired home phone lines.

These corporations' exchange access services infrastructure may still be critical to their provision of other, non-wired phone and telecommunication technologies. Exchange access services may interface with cell phones, wired phones, computers, and other technologies used to receive and transmit information through wired and wireless means.

1.
Is the "business of providing exchange access services" by a "public service corporation that offers telephone or telecommunications pursuant to Title 40 and that provides exchange access services," (A.R.S. § 42-5252(B)) limited to services that physically connect a customer's premises to the local telecommunications network through landline phones and traditional copper phone wires?
2.
Does the business of providing "exchange access services," defined as "telephone or telecommunication exchange access lines or channels that provide local access from the premises of a customer to the local telecommunications network to effect the transfer of information," (A.R.S. § 42-5251(3)) include provision of services offered through wireless, digital, fiber-optic, coaxial cables, ethernet, or telecommunication or telephone services by a public service corporation, if those services' functionality is dependent on the ability to interface with exchange access lines or channels?
3.
With respect to the Telecommunication Fund for the Deaf, established in A.R.S. § 36-1947 and administered in accordance with A.R.S. §§ 42-5251-5252, and the responses provided by the Attorney General and Solicitor General to Questions 1 and 2, what services and related gross proceeds or income does the existing assessment

apply to?

Thank you for your attention to this matter. We appreciate your assistance and would be pleased to provide any additional information to support your inquiry.

Sincerely,

Nikki Soukup
Executive Director



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