

BEREC Analysis

Monitoring of the Joint Statement agreed between Ukraine and EU Operators

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Executive Summary

Following the ongoing full-scale war against Ukraine launched by Russia on 24 February 2022, the Body of European Regulators for Electronic Communications (BEREC) has closely monitored the telecommunications sector's response to the crisis and welcomed the measures voluntarily provided by EU operators. To gain a comprehensive understanding of what has been implemented by operators, BEREC started to collect information from NRAs and operators already in March 2022. In May 2022 and June 2023, BEREC continued with a second and third data collection exercise, with the aim of gathering more detailed information covering not only the retail measures applied by European Economic Area¹ (EEA) and Ukrainian (UA) operators but also the relevant wholesale measures agreed in the Joint Statement.²

This Joint Statement, which was first signed in April 2022 and several times renewed, most recently in January 2024³, establishes a stable framework to help people fleeing the war against Ukraine stay in touch with family and friends back home and maintain access to information. The measures include affordable or free calls, measures to cover calls to fixed line numbers in Ukraine and ensure sustainable inter-operator prices, which allow operators to provide consumers with cross-border calls at an affordable rate. BEREC and the Ukrainian National Regulatory Authority (NCEC) were tasked with monitoring the implementation of the agreed measures and therefore launched this fourth round of data collection.

Altogether, 7 UA operators and 22 EEA groups and operators signed the Joint Statement which is open to all operators willing to join. This report includes data from 29 NRAs (28 BEREC members or participants without voting rights plus the Ukrainian National Regulatory Authority, NCEC). In particular, 24 BEREC member NRAs have received replies from 53 mobile and 30 fixed operators that have signed the Joint Statement.⁴ NCEC has received data from 4 mobile operators and 2 fixed operators. All UA operators that provided data have signed the Joint Statement, hence there is no further differentiation between them.

According to the latest data collected in April 2024, the termination rates charged to EEA operators which signed the Joint Statement are in general lower than for EEA operators which have not signed the Joint Statement. Fixed EEA operators generally pay higher termination rates than mobile EEA operators to UA operators, both for fixed and mobile termination. Termination rates charged to EEA operators have fallen during the period covered in this report; however, they remain significantly higher than typical eurorates⁵. This is also true for termination rates charged to UA operators

¹ EU countries plus Iceland, Liechtenstein, and Norway.

² <https://digital-strategy.ec.europa.eu/en/library/joint-statement-eu-and-ukrainian-operators-help-refugees-ukraine-stay-connected>

³ [Joint Statement by EU and Ukrainian operators to help refugees from Ukraine stay connected | Shaping Europe's digital future \(europa.eu\)](#)

⁴ The drop from 28 to 24 NRAs in this paragraph is based on the fact that in four countries, none of the operators had signed the agreement. In addition to the 53 mobile operators mentioned above, four mobile operators filled in the data although they are not signatories of the Joint Statement. Another two signatories sent data but combined the answers for their mobile and fixed operations and were excluded because the figures in this report demand a clear split between fixed and mobile operations.

⁵ It should be also noted that in some cases operators cannot split termination from transit in the data they report

Transit rates for voice traffic remain highly heterogeneous for operators from different EEA countries, with mobile operators typically paying less per minute than fixed network operators. Furthermore, from the data, BEREC can observe that the transit rates in the monitoring period were, in general, slightly decreasing. At the same time, there is a significant disparity in transit rates for UA and EEA operators (see Figure 6 and Figure 12).

Wholesale roaming revenues of EEA operators per minute, SMS, and GB were very low, particularly for data roaming, and the tendency is to decrease in this period compared to the last period as well. Some EEA operators did not provide data on revenues, which could indicate that they provide wholesale roaming for free to UA operators or that they did not want to share this information. Volumes submitted by these operators were therefore excluded from the calculations, as these would lead to non-representative prices.

UA operators charge higher average prices for termination than they pay, and the average rates for Joint Statement signatories are in general lower than those for non-signatories.

The average wholesale roaming payments and revenues per minute, SMS, and GB made by UA operators are significantly lower for EEA operators which signed the Joint Statement compared to non-signatories. This confirms the qualitative information from both UA and EEA operators that the Joint Statement's implementation regarding wholesale roaming is effective. However, wholesale roaming rates have remained stable or slightly increased over the reporting period.

On the retail side, both EEA and UA operators report passing full benefits of low wholesale rates on to consumers. EEA operators continue to offer free SIM cards to refugees, free international calls to Ukraine, and monthly packages usable in the home country. In addition to telecommunications services, EEA operators provide smartphones, power banks, and laptops to refugees or support charity organizations. Despite the decrease in incoming traffic and difficulties in maintaining the subscriber base, as well as the necessity to invest in network restoration and dealing with other negative consequences of the ongoing Russia's full-scale war against Ukraine, UA operators continue to offer free or greatly reduced roaming services to their customers being focused on customers' needs (customer's profile).

1. Introduction

1.1. Background

Following the Russia's full-scale invasion of Ukraine on 24 February 2022, BEREC has closely monitored the telecommunications sector's response to the crisis. Among other actions, BEREC launched a first data collection through NRAs during March 2022 to gather information regarding the support provided by telecommunications operators to Ukraine (e.g. free international calls, free roaming, etc.) and shared this information among its members and with the European Commission (EC). In May 2022, BEREC launched a second data collection. The aim of this data collection was

- a) to gather more detailed information covering not only retail measures applied by operators but also relevant wholesale measures applied between EEA and UA operators and;
- b) to understand the impact of the Joint Statement signed on 8 April 2022.

In April 2024, BEREC launched a fourth collection to monitor the implementation of the prolonged Joint Statement signed in January 2024⁶ with an identical aim as for the third data collection in April 2023, namely:

- a) monitoring the implementation of the Joint Statement, especially the lowering of the wholesale roaming and termination rates charged between EEA and UA operators; and
- b) understanding potential issues of fraud and potential obstacles operators might face in relation to the implementation of the Joint Statement.

Apart from EEA NRAs and operators, NCEC and UA operators were invited to contribute to this exercise, however only those that have signed the Joint Statement were asked to provide data. The results of this data collection are presented in this report.

1.2. Joint Statement

The EC, the European Parliament, BEREC and NCEC facilitated the signing of a Joint Statement by EEA and UA operators on 8 April 2022 to ensure they can sustain their voluntary measures and apply them as widely as possible throughout Europe. The Joint Statement establishes a stable framework to help people fleeing the Russian full-scale war against Ukraine stay in touch with family and friends back home and have access to information.

The EEA signatories of the statement intend to reduce wholesale roaming charges and termination rates as well as to pass on the full benefits of the reduction of termination rates by UA operators to customers calling from the EEA to Ukraine. On the other hand, the UA

⁶ <https://digital-strategy.ec.europa.eu/en/library/joint-statement-eu-and-ukrainian-operators-help-refugees-ukraine-stay-connected>

signatories intend to gradually reduce international termination rates for calls to Ukraine originated by EEA numbers and calls to Ukraine originated by UA numbers roaming in the EU as well as to pass on the full benefits of the reduction of wholesale roaming charges by EU operators to their customers roaming in the EU.

Ever since July 2023, the number of mobile and fixed operators that have signed the Joint Statement varies from zero to seven per country. BEREC would like to note that in many cases, the statement is signed at the group level and might therefore appear in the statistics more than once.

The Joint Statement is also signed by some International Carriers, which, in response to measures undertaken by EU/EEA operators and Ukrainian operators, intend to pass on the full benefits of the reduction of termination rates to their counterparts. However, these signatories were not contacted in the course of the data collection.

Since the prolongation of the Joint Statement in February 2023, fixed operators in Ukraine are also signees of the Joint Statement.

1.3. Operators contributing to the monitoring

The fourth round of data collection was restricted to operators that have signed the Joint Statement. The questionnaire therefore was circulated to all EEA operators as well as to UA operators, however only those EEA operators that have signed the Joint Statement were asked to provide data. In some cases, EEA operators which have not signed the Joint Statement provided data on a voluntary basis; however, this information has not been included in the BEREC analysis.

Altogether, 53 EEA mobile operators, 30 EEA fixed operators, 4 UA mobile operators and 2 UA fixed operators have provided data for this data collection. A table summarizing how many operators replied from each country is added in Table 1 in the appendix.

2. Wholesale Measures EEA operators

The data collection included an extensive list of questions regarding wholesale charges (termination and roaming) between EEA and UA operators. The following sections include the main results of the analysis done based on the inputs received from EEA operators. Several operators provided incomplete data, such as submitting only volumes and not revenues for particular indicators. This could have several reasons: first, considering that this data collection is (like the Joint Statement) a voluntary exercise and might require significant resources, some operators might have been unable or unwilling to provide data at the requested level of detail. In other cases, operators did not achieve revenues with wholesale roaming or termination services. If revenue data were not provided, those operators were not included in the calculation of averages. For one operator, it was confirmed that revenues were, in fact, zero. This operator was included in the data analysis.

2.1. Termination

2.1.1. Average price paid for termination by EEA operators to fixed and mobile UA operators

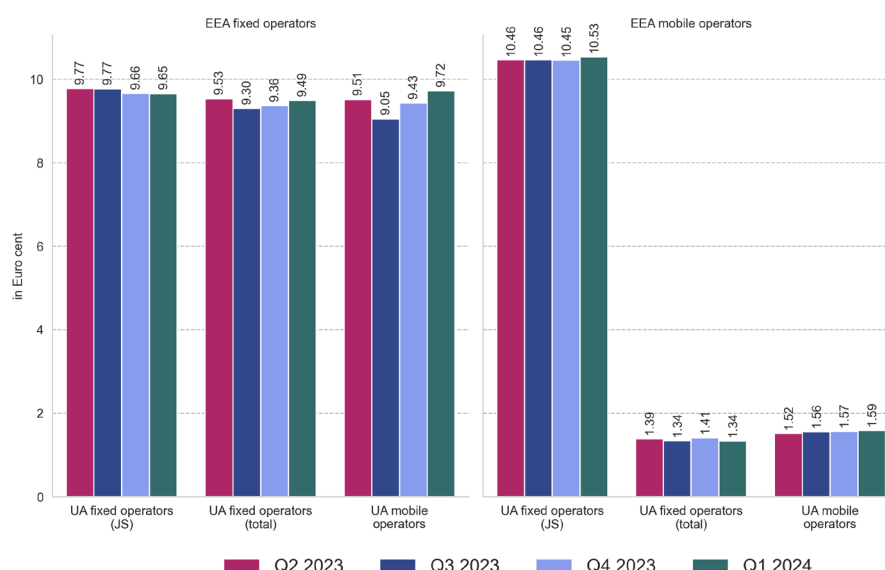


Figure 1: EEA weighted Average price per termination minute paid by EEA fixed and mobile operators that have signed the Joint Statement to UA operators (varying number of replies for each set of bars, from left to right, $n=[5, 24, 24, 14, 36, 49]$ ⁷. Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute

⁷ In the Figure, it appears that termination payments to fixed operators that have signed the JS in UA are higher than the termination payments that are paid to the total of fixed operators in UA. This can be due to the low number of respondents to this question. Some operators noted that for them it was not technically possible to distinguish between signatories and non-signatories in UA fixed networks.

2.1.2. Average revenues per unit charged by EEA operators for termination from fixed and mobile UA operators

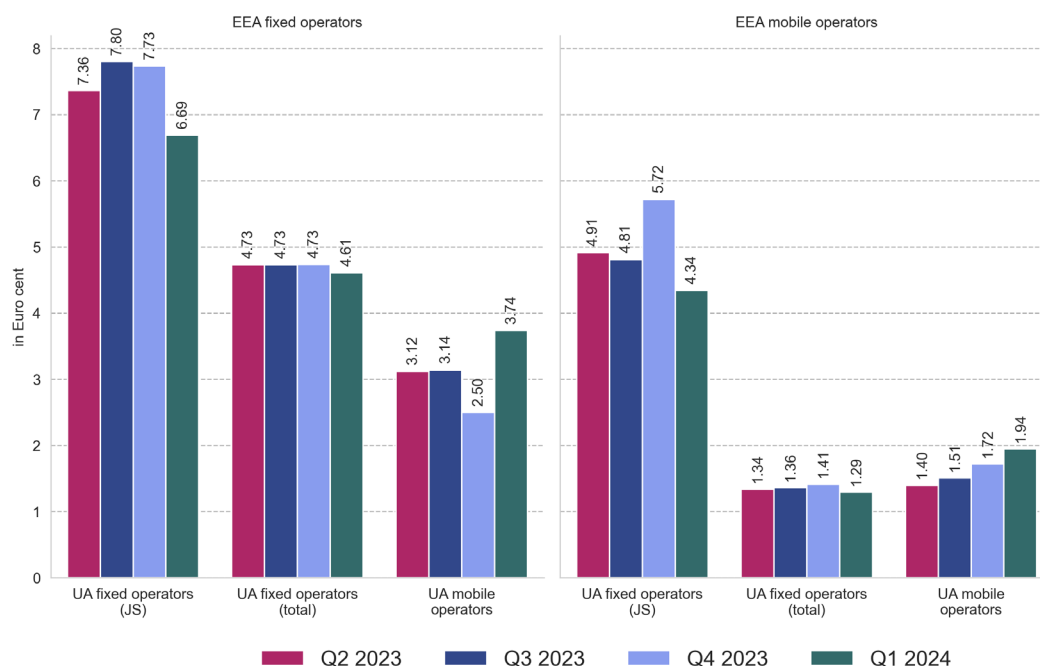


Figure 2: EEA weighted average termination revenues per minute for termination minutes originated in UA (varying number of replies for each set of bars, from left to right, $n=[6, 17, 16, 8, 28, 31]^8$).

Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute

⁸ It appears that termination revenues from fixed operators that have signed the JS in UA are higher than the termination revenues obtained from the total of fixed operators in UA. This can be due to the low number of respondents to this question. Some operators noted that for them it was not technically possible to distinguish between signatories and non-signatories in UA fixed networks.

2.1.3. Comparison of average payments with average revenues

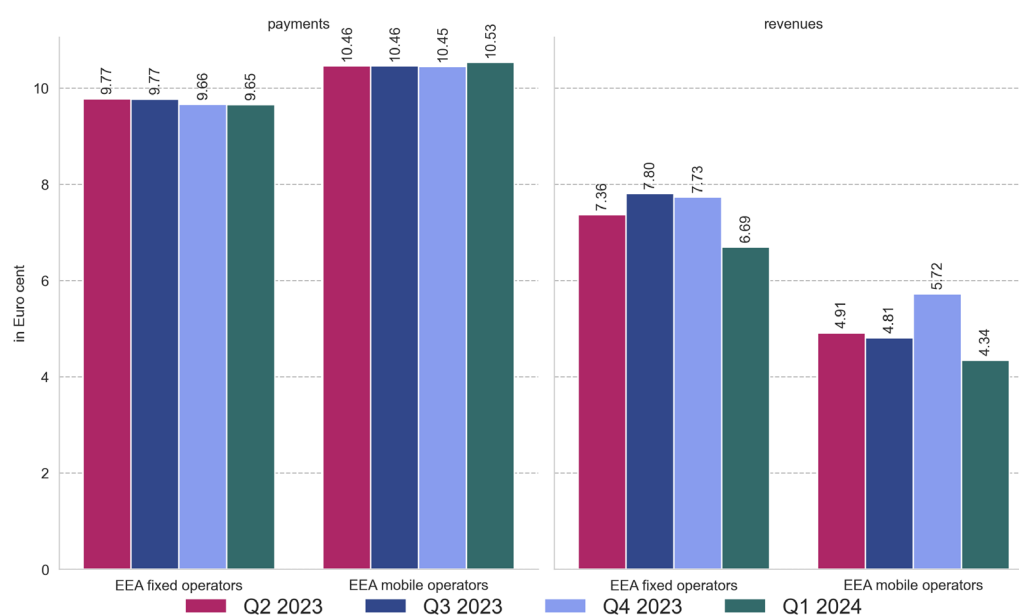


Figure 3: Weighted average termination rates paid and charged by EEA operators (fixed and mobile) to/from fixed UA operators (JS signatories) for termination (varying number of replies for each set of bars, from left to right, n=[5, 14, 6, 8]). Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute

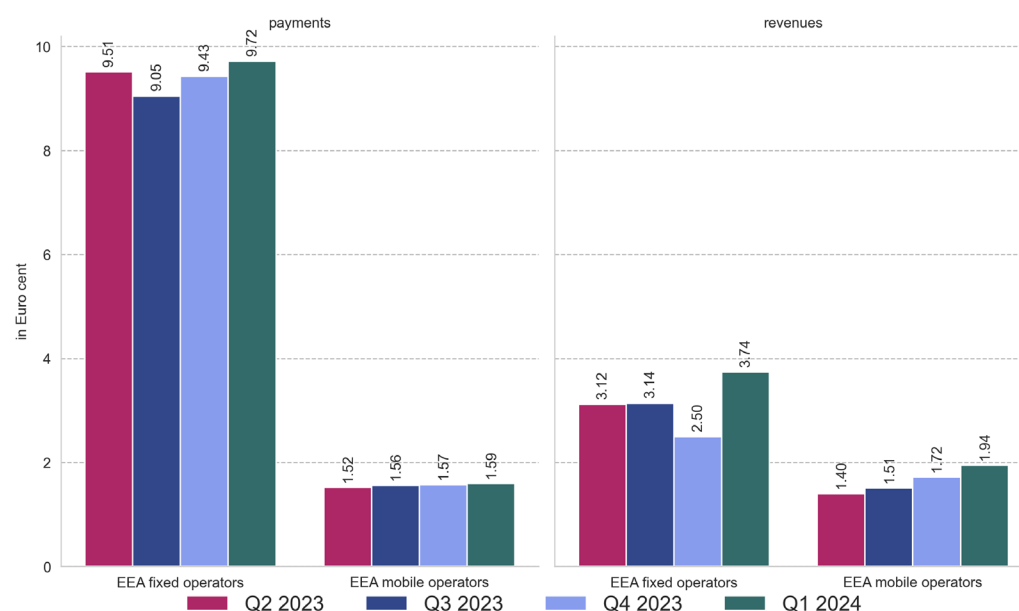


Figure 4: Weighted average termination rates paid and charged by EEA operators (fixed and mobile) to UA mobile operators (Joint Statement signatories) for termination (varying number of replies for each set of bars, from left to right, n=[24, 49, 16, 31]). Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute

2.2. Transit

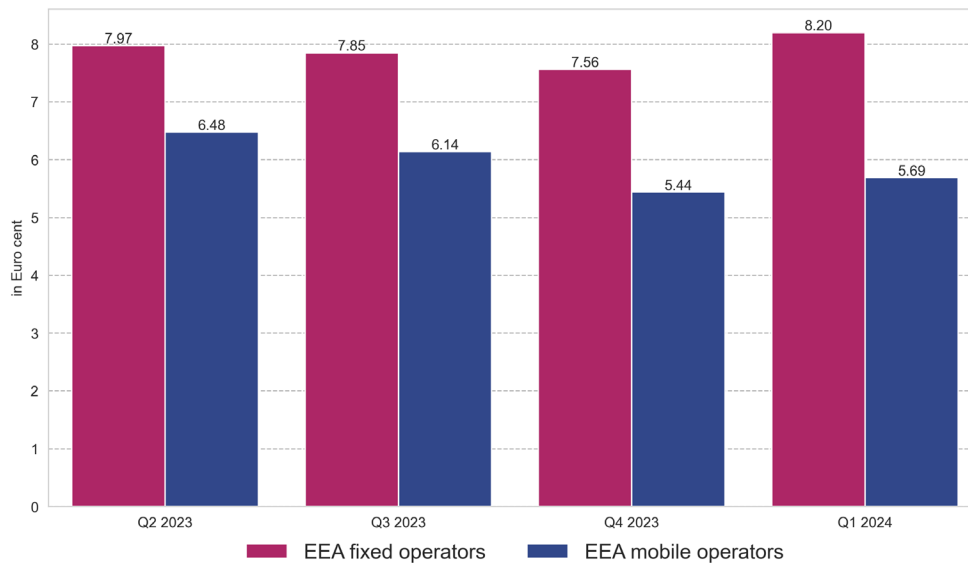


Figure 5: Weighted average transit rates paid by EEA operators (fixed and mobile) (n=11 EEA fixed operators and 19 EEA mobile operators). Please note that five mobile and two fixed operators reported transit rates of zero. These are included in the calculation.

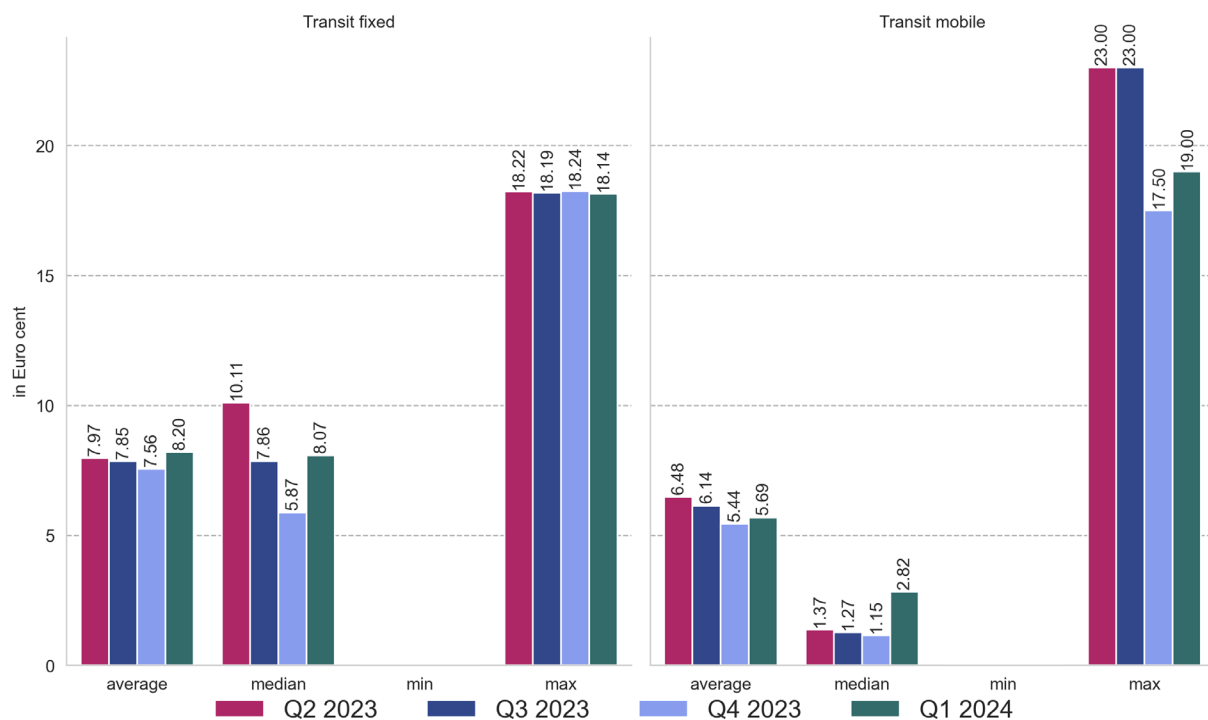


Figure 6: Transit rates paid by EEA operators (average, median, minimum and maximum) (n=11 EEA fixed operators and 19 EEA mobile operators)

2.3. Wholesale roaming

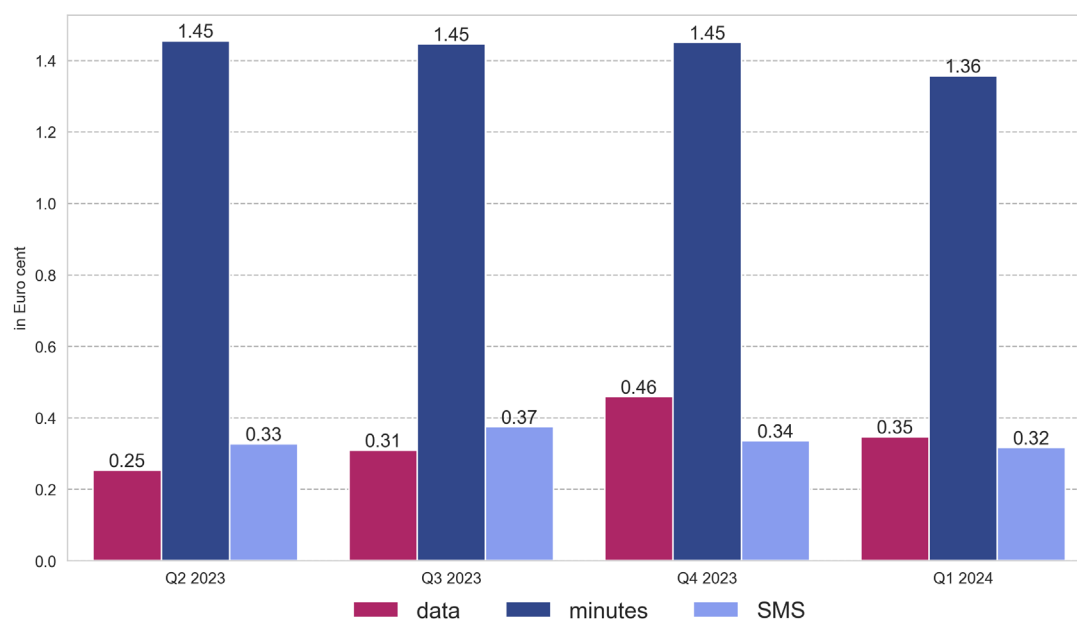


Figure 7: Weighted average wholesale roaming revenues per unit received by EEA operators from UA operators per GB, minute and SMS (varying number of replies for each unit type, data [n=48], SMS [n=44], minutes [n=48])⁹. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute, 0.4 Eurocent per SMS and 1.8 Euros per GB (2023) and 1.55 Euros per GB (2024)

⁹ Please note that some operators reported zero revenues and high volumes. As these are true zeroes and not reporting mistakes, the respective operators are also included which leads to relatively low values of Eurocent per unit. For a comprehensive view of wholesale roaming volumes, please also refer to Chapter 4.

3. Wholesale Measures UA operators

3.1. Termination

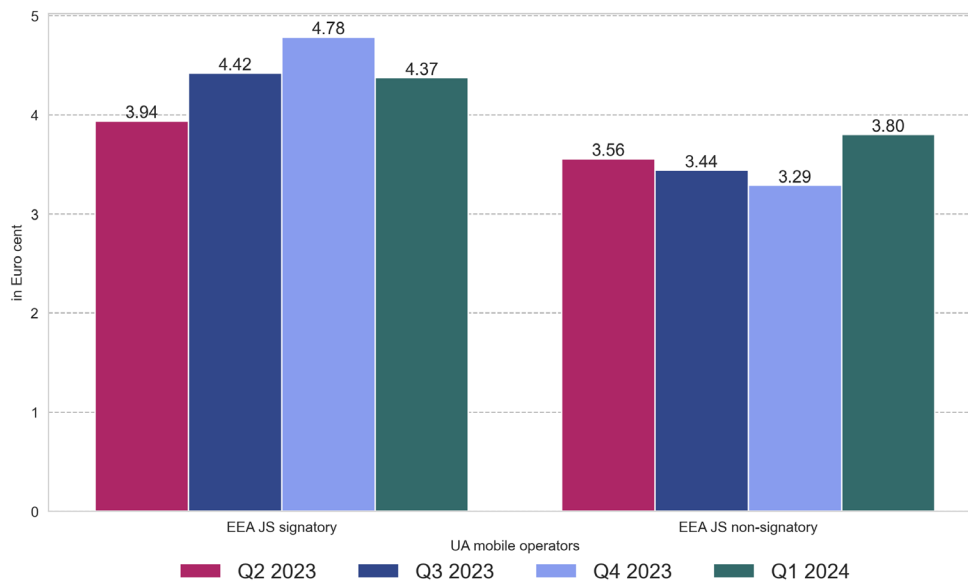


Figure 8: Weighted average termination rates paid by UA operators (mobile) for terminating minutes in fixed networks in the EEA (signatories of the Joint Statement vs. non-signatories). For confidentiality reasons, UA fixed operators were removed from the figure. Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute.

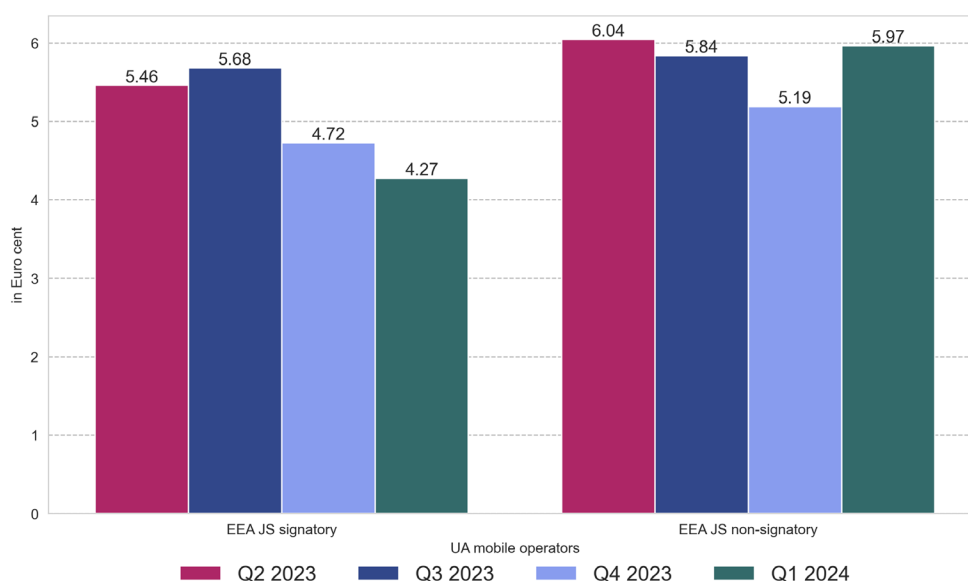


Figure 9: Weighted average termination rates charged by UA mobile operators for terminating minutes originated by EEA fixed operators (signatories of the Joint Statement vs. non-signatories) (n=4 UA mobile operators). Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute.

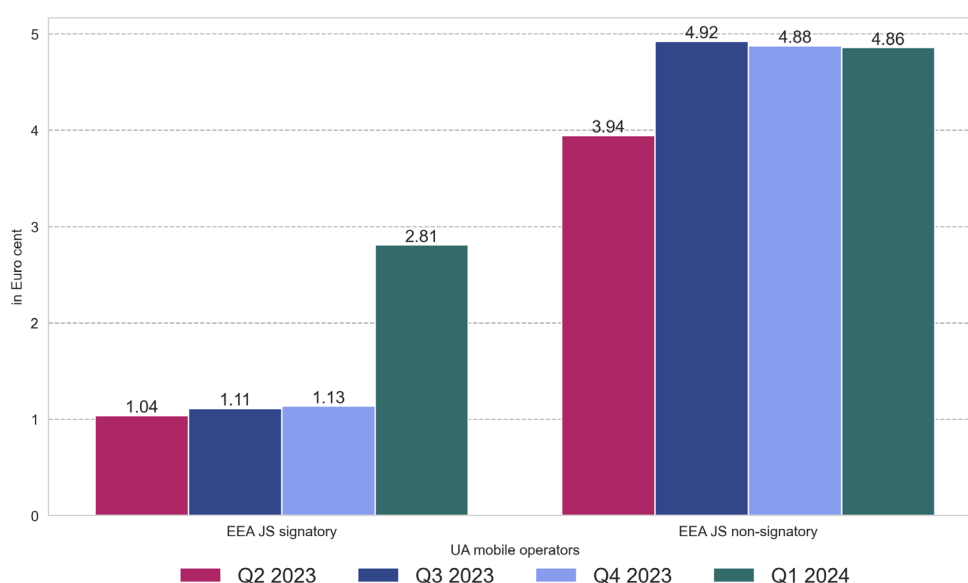


Figure 10: Weighted average termination rates paid by UA mobile operators for terminating minutes in mobile networks in the EEA (signatories of the Joint Statement vs. non-signatories). For confidentiality reasons, UA fixed operators were removed from the figure. Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute.

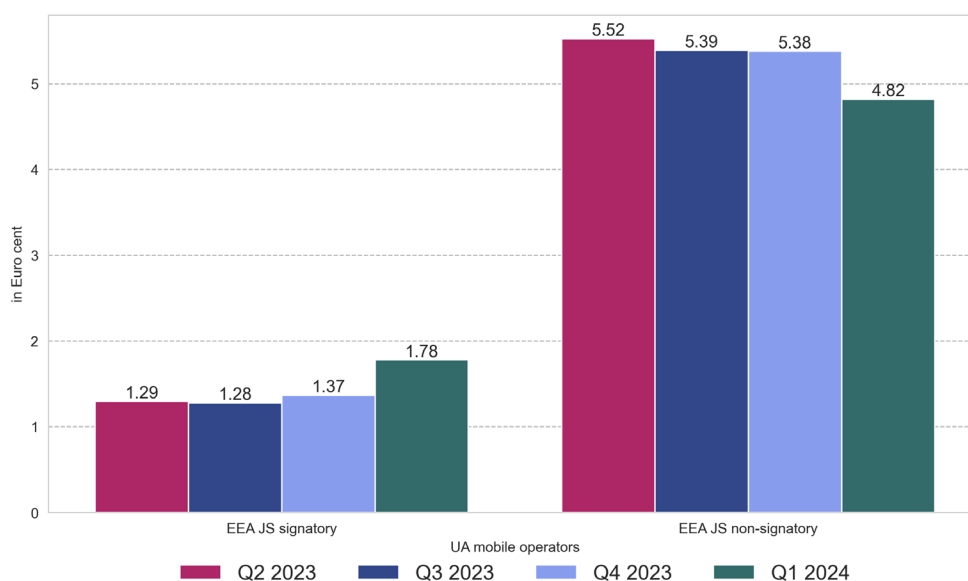


Figure 11: Weighted average termination rates charged by UA mobile operators for terminating minutes originated by mobile EEA operators (signatories of the Joint Statement vs. non-signatories)¹⁰. Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute.

3.2. Transit

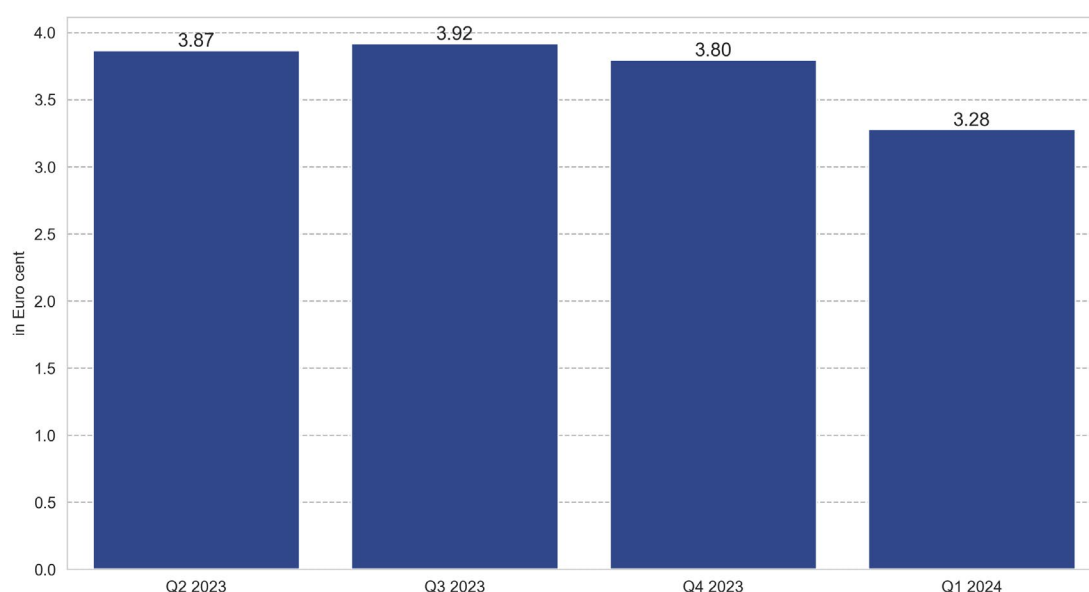


Figure 12: Weighted average transit rates paid by UA operators (mobile). For confidentiality reasons, UA fixed operators were removed from the figure.

¹⁰ UA fixed operators did not provide data on revenues from fixed termination rates charged to mobile EEA operators.

3.3. Wholesale roaming

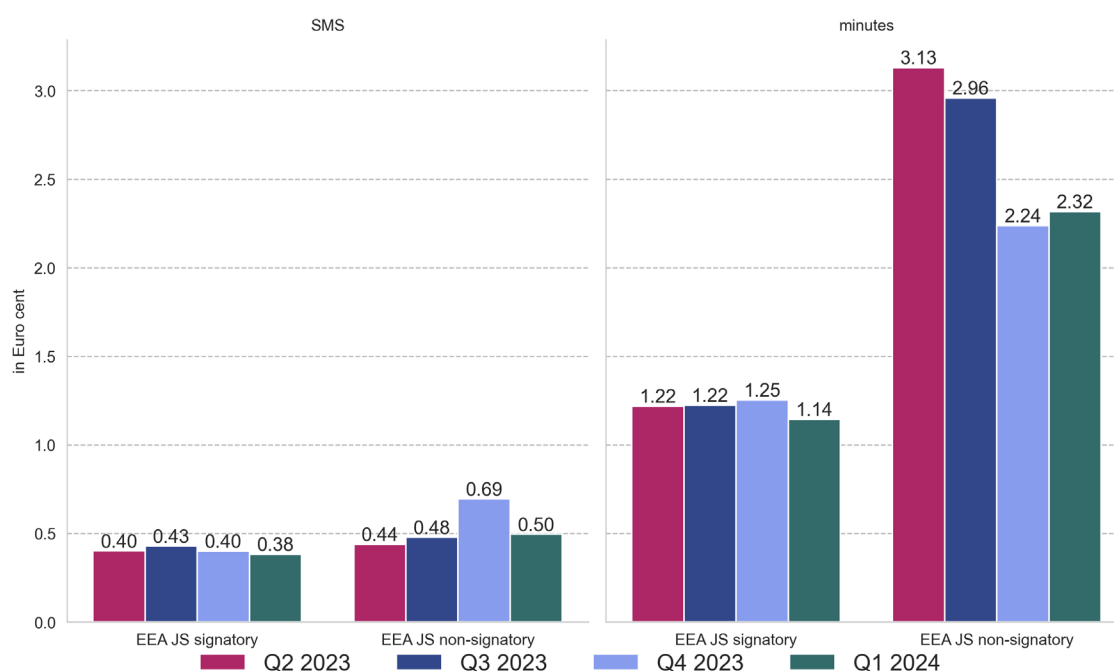


Figure 13: Weighted average rates paid by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming SMS and minute. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute, 0.4 Eurocent per SMS and 1.8 Euros per GB (2023) and 1.55 Euros per GB (2024)

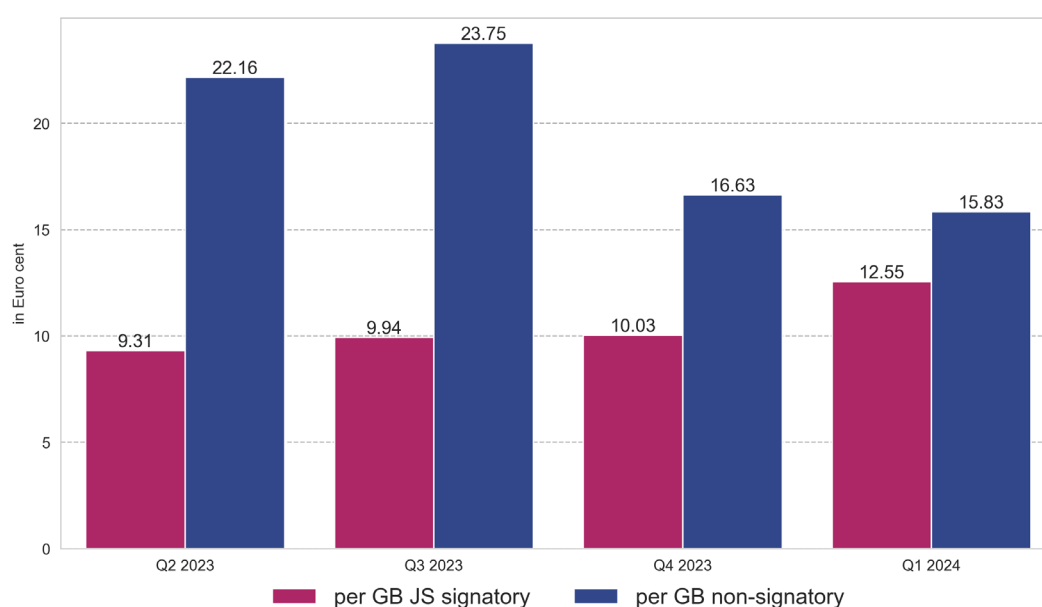


Figure 14: Weighted average rates paid by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming GB. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute, 0.4 Eurocent per SMS and 1.8 Euros per GB (2023) and 1.55 Euros per GB (2024)

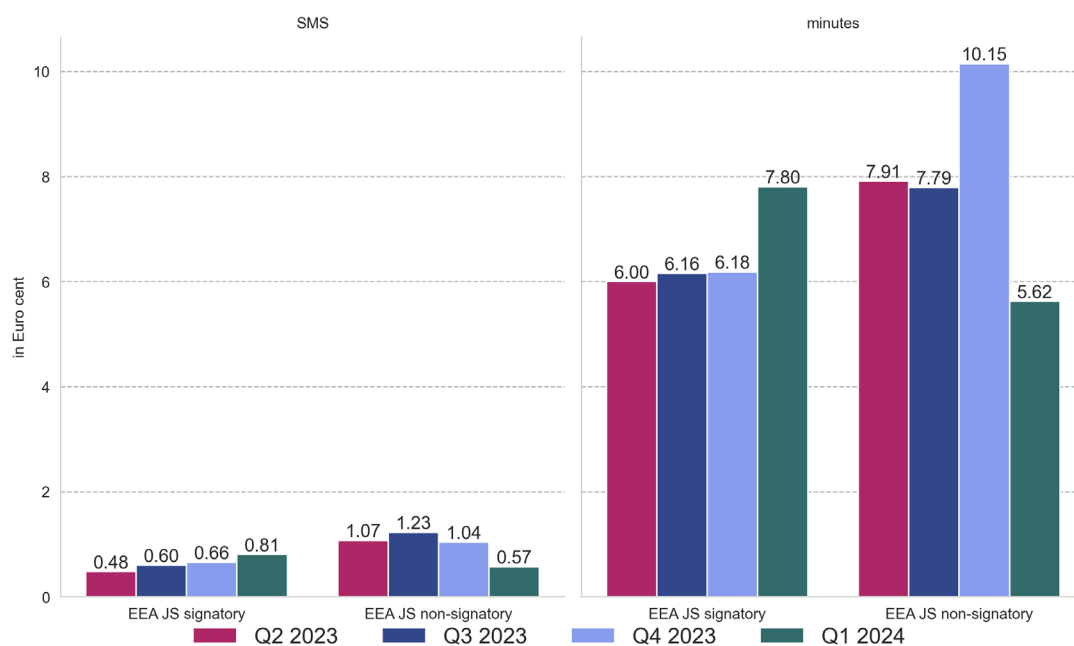


Figure 15: Weighted average rates charged by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming SMS and minute. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute and 0.4 Eurocent per SMS¹¹

¹¹ Data for Figure 15 show indeed that the reported average rates charged in Q1 2024 are higher for JS signatories than for non-signatories.

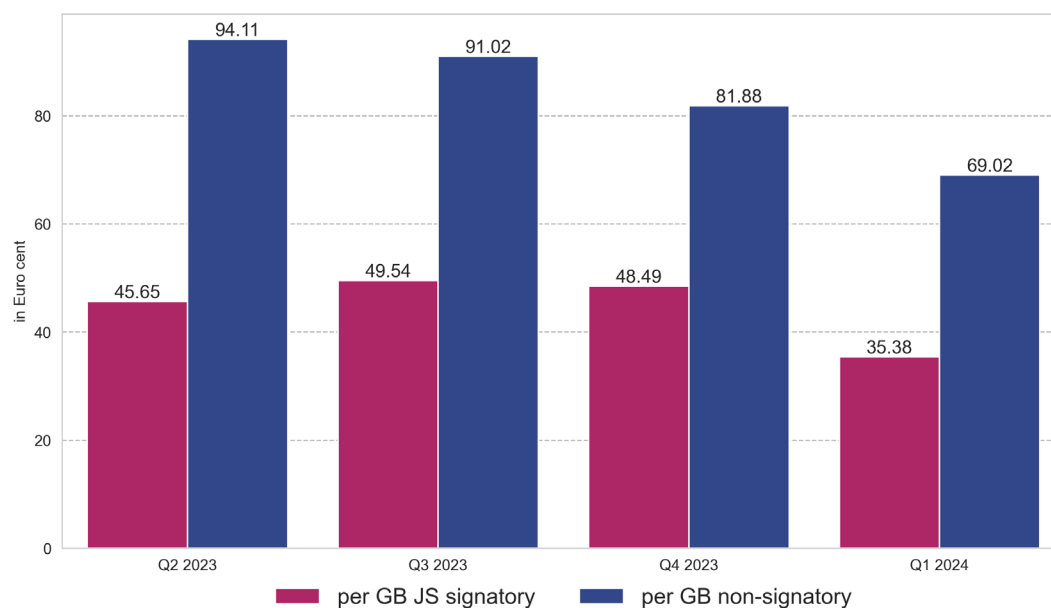


Figure 16: Weighted average rates charged by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming GB. Please note the regulated wholesale roaming caps at EU level and 1.8 Euros per GB (2023) and 1.55 Euros per GB (2024)

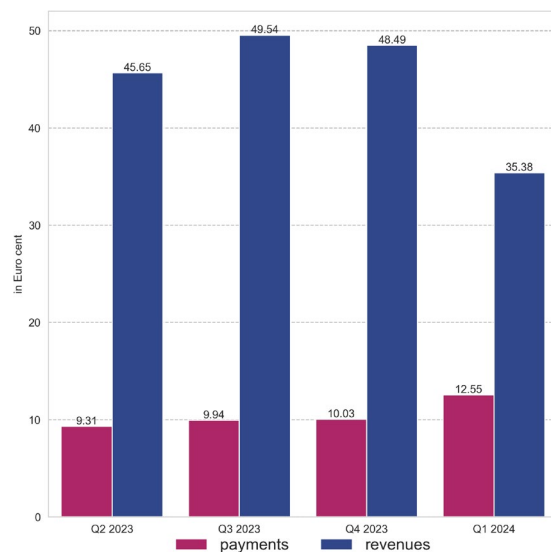


Figure 17: Comparison of wholesale roaming payments and revenues of UA operators per GB (only through EEA operators that signed the Joint Statement). EU regulated rate = 1.8 Euro per GB (2023) and 1.55 Euro per GB (2024)

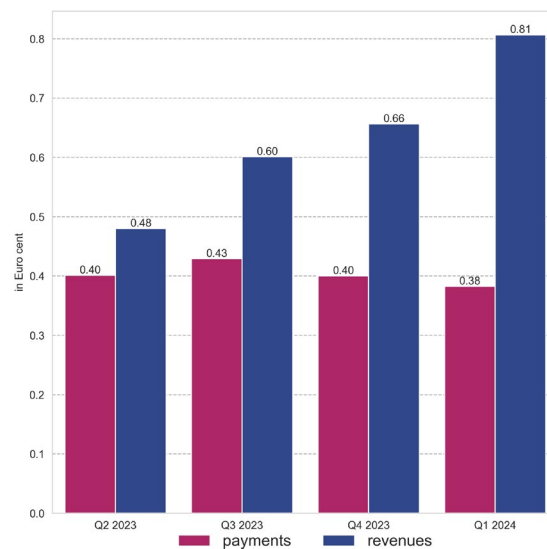


Figure 18: Comparison of wholesale roaming payments and revenues of UA operators per SMS (only through EEA operators that signed the Joint Statement). EU regulated rate = 0.4 Eurocent/SMS

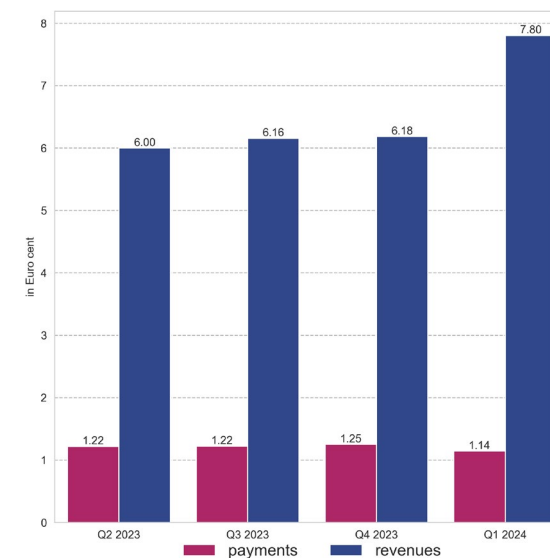


Figure 19: Comparison of wholesale roaming payments and revenues of UA operators per minute (only through EEA operators that signed the Joint Statement). EU regulated rate = 2.2 Eurocent/minute

4. Traffic volumes

Figure 20 shows that roaming data volumes for UA subscribers roaming in the EEA exceed roaming volumes from EEA subscribers roaming in UA by factors of 1,937- 3,932, while roaming minutes for UA subscribers in the EEA exceed roaming minutes from EEA subscribers in UA by factors of 88 to 134.

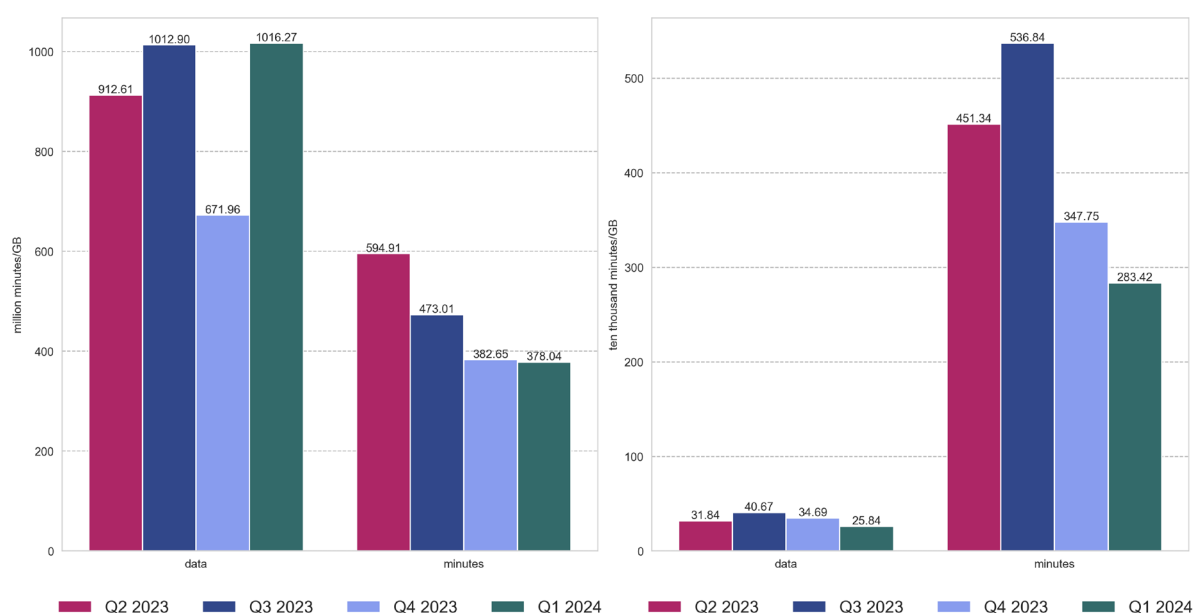


Figure 20: Wholesale roaming volumes in GB/minutes for UA subscribers in the EEA (left panel) and EEA subscribers in UA (right panel). Please note the different scales in the graphs (millions vs ten thousands).

Termination volumes for voice calls in EEA networks reported by UA operators exceed volumes in UA networks reported by EEA operators considerably, as shown in Figure 21.

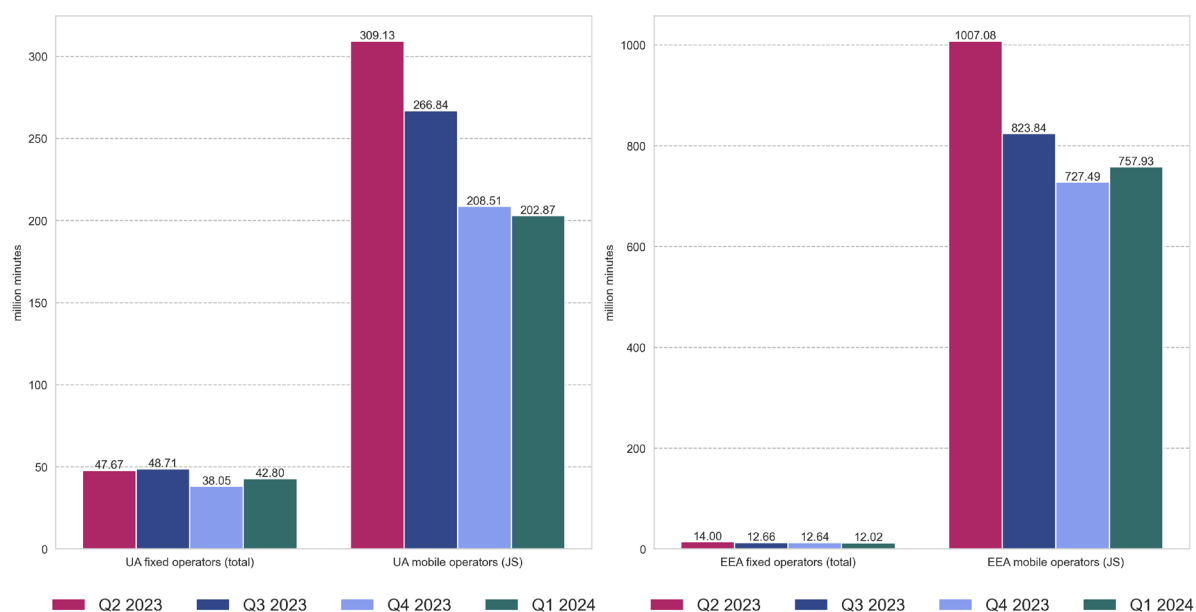


Figure 21: Voice termination volumes for termination in UA networks reported by EEA operators (left panel) and voice termination volumes in EEA networks reported by UA operators (right panel)¹². Please note the different scales in the graphs (up to 300 mio vs up to 1000 mio)

¹² There is only a low number of operators who differentiate between signatories and non-signatories in fixed networks. Therefore, for fixed network connections, we report the total.

5. General comments raised by operators

5.1. EEA operators

5.1.1. Fraud

Respondents from the majority of countries reported no significant fraud cases related to the implementation of the JS. Operators from some countries raised concerns about spoofed caller IDs and scam traffic increases. In one country, an initial increase in fraud activity was reported, but a significant decrease has been noted since February 2023 due to police investigations.

A total of 56 operators across 21 countries reported no **fraud cases**, with 40 from mobile operators and 16 from fixed operators. A total of 15 operators across 10 countries reported fraud cases, with 9 from mobile operators and 6 from fixed operators. Among the 71 operators surveyed, the majority (79%) did not report any fraud cases during the period. A smaller percentage (21%) of operators reported fraud cases, indicating that fraudulent activities were observed but were not widespread across all surveyed operators (please see the Figure 22).

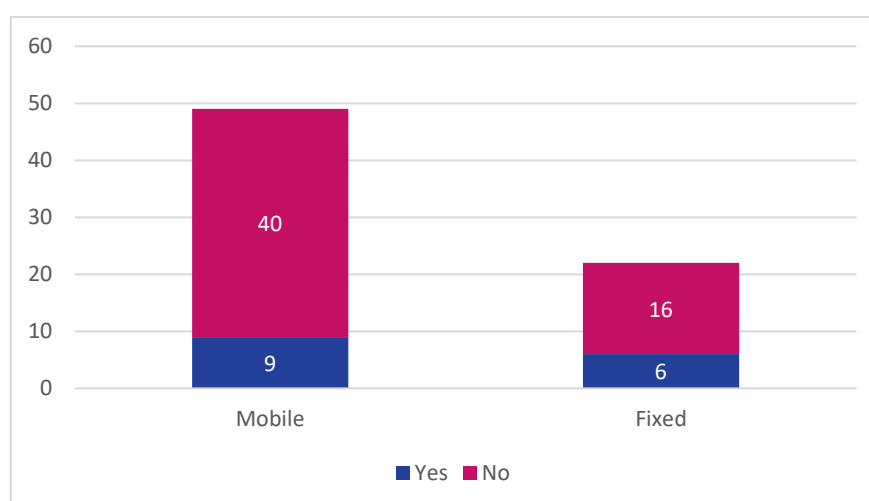


Figure 22: Number of fraud cases detected by EEA operators following the implementation of the Ukraine Joint Statement

Fraud cases were reported in both mobile and fixed operator categories, highlighting the need for vigilance and effective fraud prevention measures across the telecommunications industry. Overall, while there are some concerns and isolated cases of fraud, the data suggests that the implementation of the JS has generally been effective in mitigating fraudulent activities. Further monitoring and collaboration between operators and regulatory authorities may be necessary to address any ongoing issues effectively.

A total of 54 operators across 22 countries have reported **implementing measures** to combat fraud, with 39 from mobile operators and 15 from fixed operators. In contrast, 11 operators across 6 countries have not reported implementing any specific measures against fraud, with 7 from mobile operators and 4 from fixed operators (please see Figure 23).

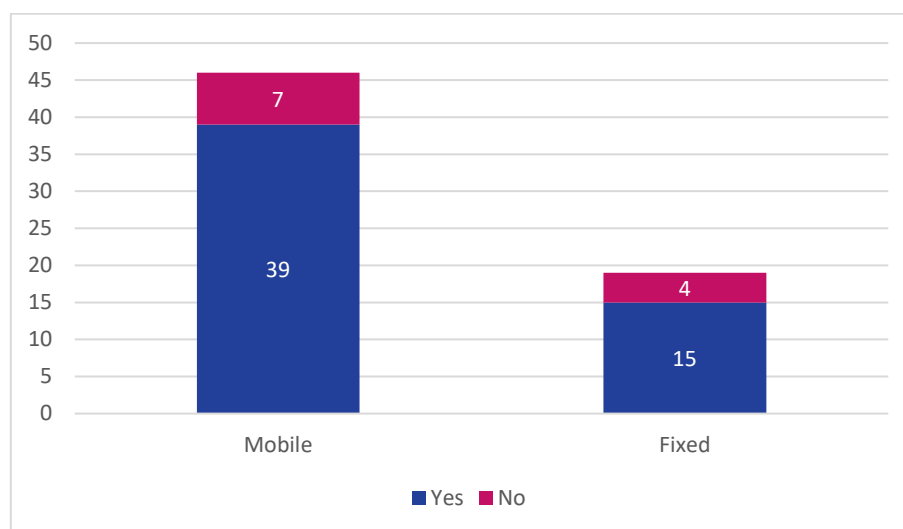


Figure 23: Number of EEA operators that implemented anti-fraud measures

The most common measures reported include regular monitoring of traffic, the use of fraud management systems to detect possible fraud patterns, and the implementation of alarms or alerts on technical applications to notify immediately if something is wrong. Other measures mentioned include the monitoring of international traffic towards specific destinations, such as Ukraine, the implementation of standard anti-fraud procedures, and the use of fraud detection tools and intelligence systems to monitor and detect any suspicious events occurring on the network. Some operators reported taking actions such as traffic filtering, setting up alert limits, and suspending SIM cards as soon as possible after detecting fraudulent activities. Additionally, specific measures such as wangiri protection against fraud and monitoring traffic from inbound roamers were mentioned.

Overall, a proactive approach towards fraud prevention and detection was evident, with operators employing various tools and strategies to combat fraudulent activities across their networks.

A total of 32 operators across 15 countries, comprising 21 mobile operators and 11 fixed operators, reported no **financial impact** due to fraud. Meanwhile, 11 operators across 6 countries, including 8 mobile operators and 3 fixed operators, reported a financial impact (Please see Figure 24).

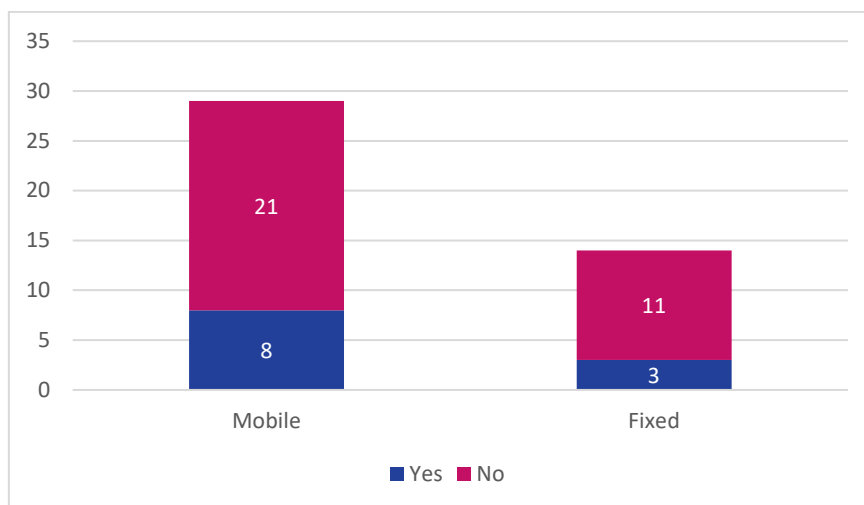


Figure 24: Financial impact on EEA operators because of fraud

The majority of operators, both mobile and fixed, reported no financial impact due to fraud. This suggests that their existing fraud prevention measures are effective in mitigating financial losses. Among the operators that reported a financial impact, the magnitude of the impact varies. Some operators reported negligible or minimal losses, indicating that the financial impact of fraud remains limited in certain cases. Operators that reported no financial impact likely have robust fraud prevention measures in place. These measures may include traffic monitoring systems, fraud detection tools, and standard anti-fraud procedures. While the majority of operators remain unaffected, a subset reported significant financial losses. This highlights the vulnerability of certain operators to fraudulent activities and underscores the importance of implementing comprehensive fraud prevention strategies.

The telecom industry is dynamic, and fraudsters continually evolve their tactics. Therefore, operators must maintain vigilance and regularly update their fraud prevention measures to stay ahead of emerging threats.

5.1.2. Obstacles

Overall, while there are some challenges in lowering wholesale termination rates, there seem to be fewer obstacles in negotiating wholesale roaming rates. The challenges primarily revolve around technical limitations, reluctance from operators to negotiate lower rates and specific regulatory constraints.

A total of 40 operators mentioned **obstacles** across 19 countries, with 30 from mobile operators and 10 from fixed operators. In contrast, 31 operators reported **no obstacles** across 15 countries, comprising 19 from mobile operators and 12 from fixed operators (please see Figure 25).

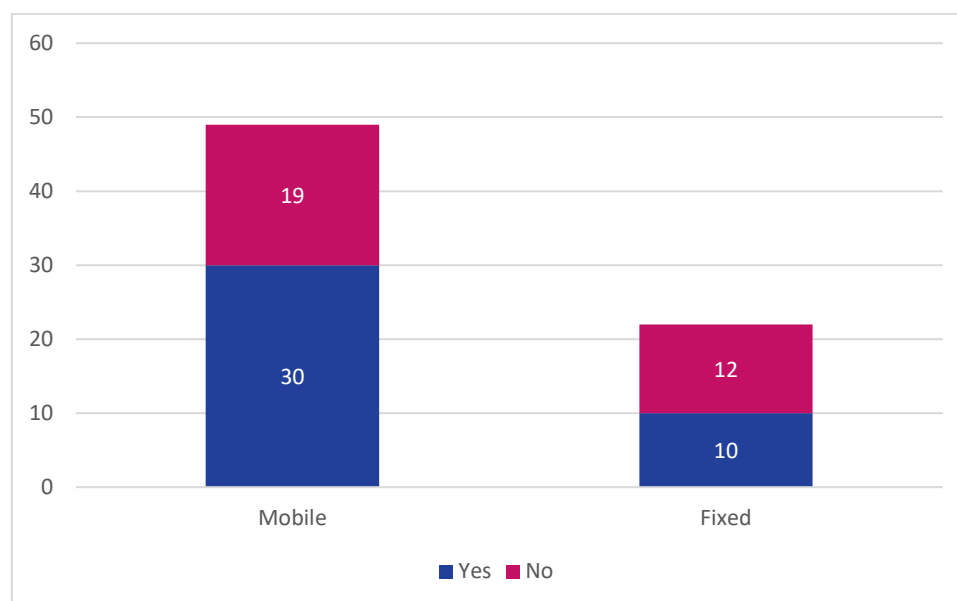


Figure 25: Number of EEA operators that face obstacles in lowering wholesale termination rates or wholesale roaming rates

Many operators cite technical limitations or dependencies on infrastructure, such as transit billing setups or direct interconnections with Ukrainian operators, as obstacles. Negotiating lower rates often requires coordination among multiple parties, and some operators face administrative handling and coordination issues. Negotiating lower rates with some Ukrainian operators, can be challenging. Regulatory constraints or discrepancies in implementing the Joint Statement, particularly concerning EU-level rates, are mentioned by several operators. Competitive pressures and market dynamics affect negotiations, with some operators mentioning reluctance from their Ukrainian counterparts to lower rates to EU levels.

Some operators face difficulties due to the size of their business or the reluctance of international carriers to cooperate. One specific Ukrainian operator is frequently mentioned as being one of the operators reluctant to lower rates, impacting negotiations for several operators across different countries. Some operators face challenges due to specific demands or conditions set by Ukrainian operators, such as extremely low data rates or preferences for certain types of roaming. While negotiating wholesale roaming rates generally seems less problematic, negotiating wholesale termination rates appears to be a more common challenge.

5.1.3. Benefits of the reduction of termination rates to customers

39 out of 45 mobile operators (87%) reported passing on the benefits to their customers, while only 6 operators (13%) indicated otherwise. For the fixed operators - similarly, 18 out of 21 operators (86%) reported passing on the benefits to their customers and 3 operators (14%) indicating otherwise (please see Figure 26).

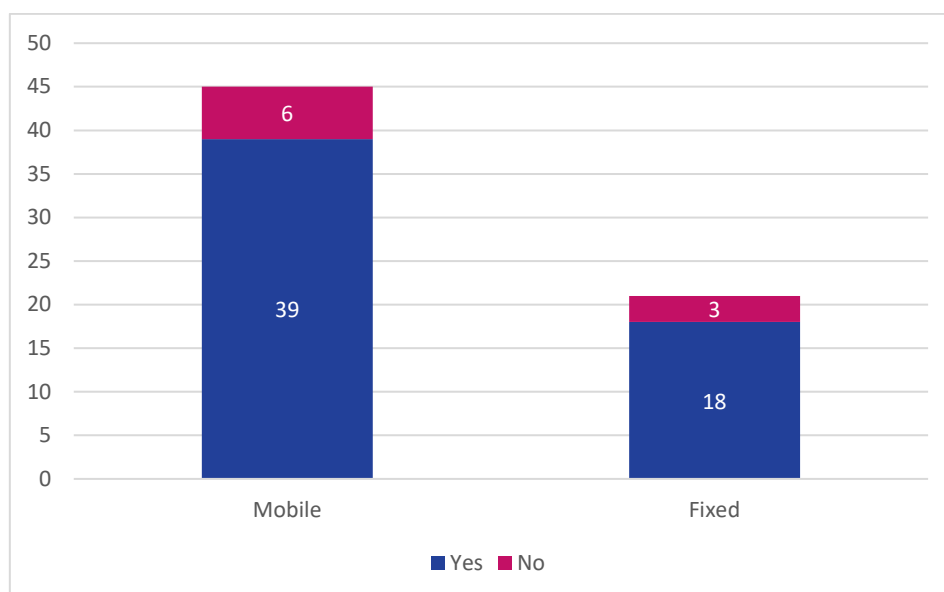


Figure 26: Number of EEA operators that pass on benefits of the reduction of termination rates

Operators have adopted various strategies to pass on the benefits to customers. Some have implemented special tariffs exclusively for citizens of Ukraine, offering reduced rates for calls and data. Others have introduced promotional pricing for international calls to Ukraine, providing discounted rates comparable to those for calls to EEA countries. While many operators have affirmed that they are passing on the benefits, there are concerns about consistency in the reduction of termination rates. Some operators noted that not all Ukrainian operators have lowered their termination rates, which may affect the extent to which benefits can be passed on to customers uniformly. Several operators have extended support to Ukrainian refugees by offering free SIM cards, special packages with free minutes for international calls, and reduced prices for international calls and roaming to Ukraine. This reflects a broader effort within the telecommunications industry to assist those affected by the full-scale war against Ukraine. Some operators mentioned that regulatory responses are still pending or that further clarification is needed. This suggests ongoing engagement with regulatory bodies to ensure compliance and effective implementation of measures related to the reduction of termination rates.

5.1.4. Suggestions for further improvement of the Joint Statement

A total of 40 operators, comprising 26 mobile operators and 14 fixed operators, did not provide any additional comments about the Joint Statement. Meanwhile, 16 operators, including 12 mobile operators and 4 fixed operators, did include additional comments (please see Figure 27).

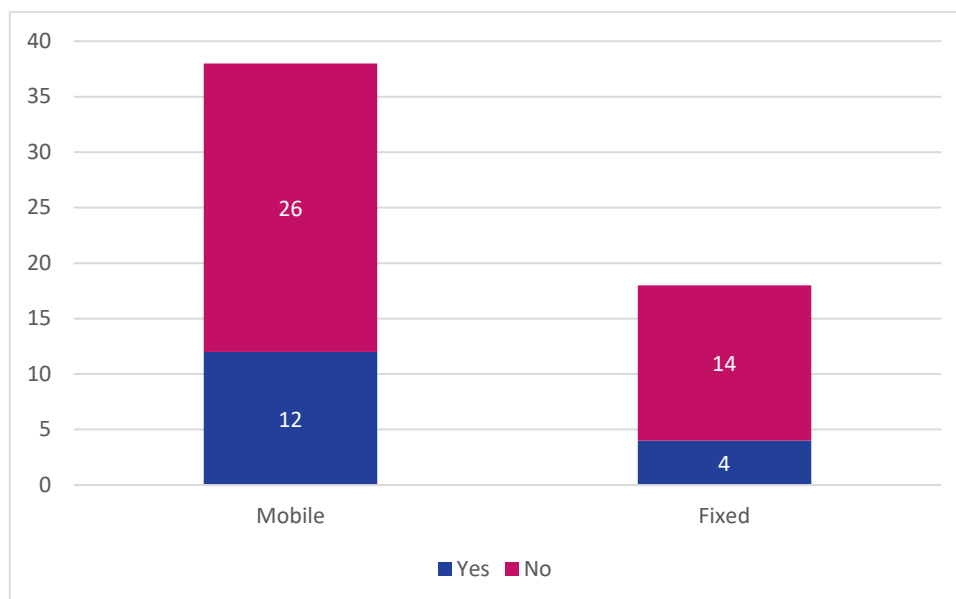


Figure 27: Number of EEA operators that suggest further improvements of the Joint Statement

Among fixed operators, there was a general trend of agreement with the Joint Statement, indicating support for the initiative within certain segments of the industry. Similarly, mobile operators tended to align with the Joint Statement, with some expressing explicit agreement. While the majority of operators refrained from providing comments, those who did generally signal support for the Joint Statement. However, the absence of remarks from some operators leaves room for interpretation regarding their perspectives on the matter.

Overall, the comments indicate a proactive approach by operators in adapting their pricing structures and services to accommodate the reduction of termination rates and provide support to customers, particularly those impacted by the full-scale war against Ukraine.

5.1.5. Voluntary measures

Based on the voluntary measures reported by operators in various countries, it is evident that there has been a significant effort to support individuals affected by the full-scale war against Ukraine.

Zero-rated Calls: Operators have implemented zero-rated international calls towards Ukraine, ensuring that customers can communicate with their loved ones without incurring additional charges.

Free SIM Cards for Refugees: Many operators are providing free SIM cards to Ukrainian refugees, often accompanied by free data and calls/SMS within certain regions or networks.

Discounted International Calls: Some operators are offering discounted rates for international calls to Ukraine, making it more affordable for customers to stay connected with friends and family in the affected areas.

Free Roaming Services: Operators have introduced free roaming services for customers travelling to Ukraine, enabling them to use their devices without additional roaming charges.

Community Support: Operators are extending support to the Ukrainian community by providing financial assistance, in-kind support, and resources to organizations aiding refugees and victims of the conflict.

Special Tariff Plans: Certain operators have introduced special tariff plans or packages tailored to the needs of Ukrainian customers, including discounted rates for specific services or bundled offerings.

Psychological Support Services: Some operators are offering psychological support helplines or online translation services to assist Ukrainian refugees during this challenging time.

Continued Assistance: Operators are maintaining their support initiatives over an extended period, ensuring that affected individuals receive ongoing assistance and support as the situation evolves.

5.2. UA operators

5.2.1. Benefits

While one mobile operator stated that they have not experienced any reduction in termination rates yet, the remaining three mobile operators reported that they pass on the benefits to their subscribers.

5.2.2. Fraud

The majority of respondents reported that they had not detected cases of fraud in connection with the Joint Statement. Two mobile operators had detected fraud. One operator reported that traffic from non-EU countries is coming with EU numbers. Another observed fraud using its SIM cards while roaming and the bypass of termination traffic through the use of EEA numbers.

5.2.3. Fraud impact

One operator stated that the financial impact due to fraud amounted previously to 73,000 USD per month, whereas the end of “previously” is not explained. Another estimated fraud to lead

to losses amounting to less than 1 % of its total revenue. Other operators did not experience financial impacts from fraud.

5.2.4. Fraud measures

Several respondents mentioned implementing the fraud detection and prevention recommendations of the GSMA. These included a 24/7 fraud management unit and a fraud management system. One respondent explained that since it mainly experienced issues with the disguise of international traffic as national traffic (and thus subject to a national mobile termination rate), it had implemented detection and blocking of incoming traffic.

5.2.5. Suggestions for further improvement of the Joint Statement

UA operators did not provide any additional comments about the Joint Statement, which might signal a general trend of agreement with the Joint Statement and its support.

5.2.6. Obstacles

Some operators mentioned a lack of direct interconnection agreements as a barrier to lowering termination rates and difficulties in negotiating such agreements. Some operators also pointed out the lack of support for the initiative among their international roaming partners in the EU to provide services at reduced rates or the willingness to reduce termination rates for incoming international traffic. Operators also mentioned the general trend for decreasing of volume of incoming traffic in Ukraine from EU, which leads to an increase in costs per unit of traffic. One respondent mentioned that routing settings were too inflexible, which made it difficult to implement interconnection. Another respondent highlighted that each deal requires difficult billing implementation and considerable resources to be involved. With regards to roaming, one respondent expressed its concerns that the regulated price of 2 Euro/GB does not reflect the Ukrainian market levels.

6. Appendix

Table 1: Number of respondents (signatories only) by country and network type. Please note that some operators provided data both as fixed and mobile operators as they offer both type of services

Country	EEA fixed operators	EEA mobile operators	Sum
AT	0	2	2
BE	2	3	5
BG	1	1	2
CZ	0	2	2
DE	3	3	6
DK	0	2	2
ES	3	3	6
FI	0	2	2
FR	3	4	7
GR	3	3	6
HR	1	1	2
HU	2	2	4
IE	1	2	3
IT	3	4	7
LT	0	1	1
MT	1	1	2
NL	0	1	1
NO	0	1	1
PL	1	4	5
PT	2	2	4
RO	2	3	5
SE	0	3	3
SI	1	1	2
SK	1	2	3
Total	30	53	83