

BEREC Analysis

Monitoring of the Joint Statement agreed between Ukraine and EU Operators



5 June 2025

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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, April 2023, and April 2024, BEREC continued with a second, third, and fourth 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 has been renewed several times, most recently in July 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 fifth 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 23 NRAs. In particular, 22 BEREC member NRAs from the EEA have received replies from 48 mobile and 28 fixed operators that have signed the Joint Statement. 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.

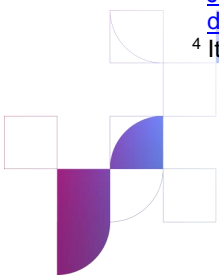
According to the latest data collected in April 2025, the termination rates charged to EEA operators which signed the Joint Statement are in general lower than for EEA operators which have not signed the Joint Statement. Fixed EEA operators generally pay higher termination rates than mobile EEA operators to UA operators, both for fixed and mobile termination. The average termination rate charged to EEA operators has increased during the period covered in this report; with some operators' rates remaining significantly higher than typical eurorates.⁴ For termination rates charged to UA operators, there is no clear time trend. Reported termination rates vary greatly across EEA operators but even within operator and across periods, ranging from 0.02 Eurocent per minute to 37.8 Eurocent per minute.

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 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 paying slightly less than fixed network operators. Some operators report that they pay zero transit rates for calls to certain UA mobile operators. Others report that a positive transit rate is paid but that it is included in termination and cannot be broken down. Due to the nature of the data collection, this information cannot be included in the averages used for the figures in this report, which may result in an upward bias. Furthermore, from the data, BEREC can observe that the reported transit rates in the monitoring period were rather stable. At the same time, there is a significant disparity in transit rates for UA and EEA operators (see Figure 7 and Figure 13).

Wholesale roaming revenues of EEA operators per minute, SMS, and GB were very low, particularly for data roaming, and were very similar to values from the last collection. 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. Nevertheless, most of them have decreased since the last 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 Russian 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 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.

Since 2023, BEREC has launched yearly collections to monitor the implementation of the Joint Statement. The last prolongation was signed in July 2024.⁵ The current fifth collection was conducted with the same aim as the third and fourth data collections in April 2023 and April 2024, 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.

⁵ <https://digital-strategy.ec.europa.eu/en/library/joint-statement-eu-and-ukrainian-operators-help-refugees-ukraine-stay-connected>

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 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.

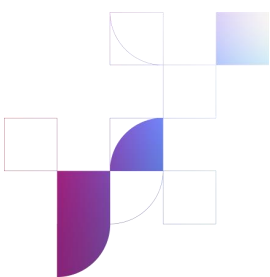
The Joint Statement is also signed by some International Carriers, which, in response to measures undertaken by EU/EEA operators and Ukrainian operators, intend to pass on the full benefits of the reduction of termination rates to their counterparts. However, these signatories were not contacted in the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

When counting only the signatories, 48 EEA mobile operators, 28 EEA fixed operators, 4 UA mobile operators and 2 UA fixed operators have provided data for this data collection. An overview of 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

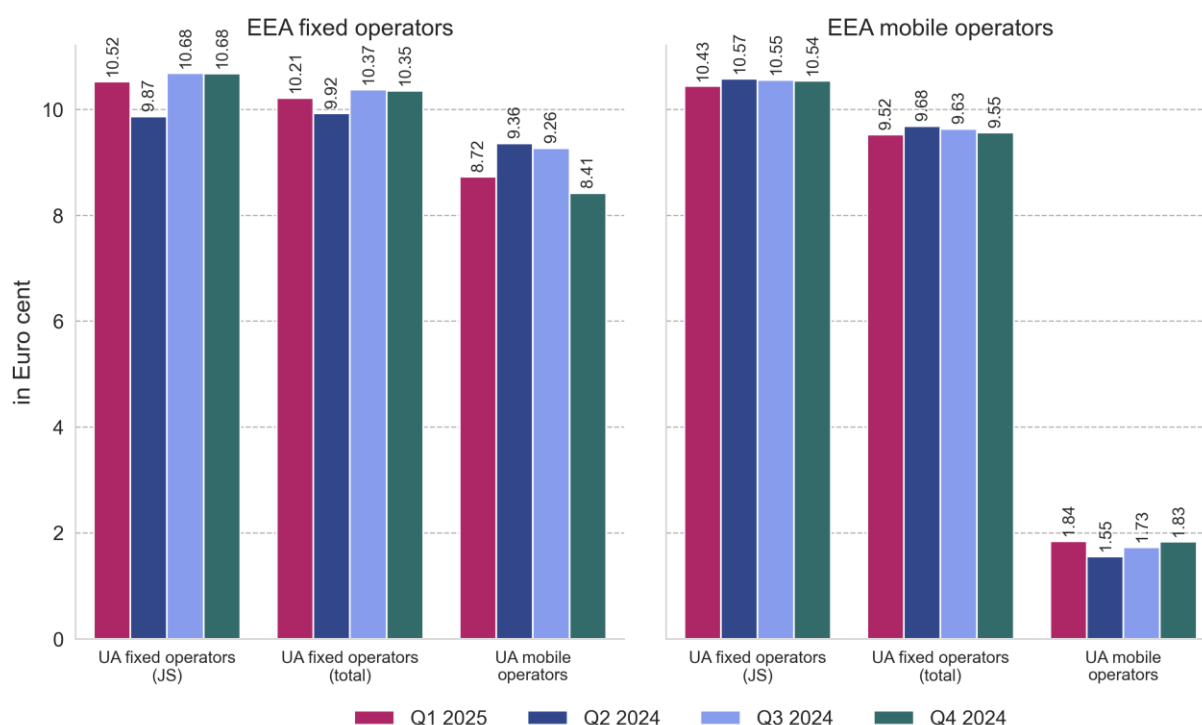


Figure 1: EEA weighted Average price per termination minute paid by EEA fixed and mobile operators that have signed the Joint Statement to UA operators (varying number of replies for each set of bars, from left to right, $n=[4, 22, 21, 10, 35, 43]$). Please note that the single maximum Union-wide mobile 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.

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

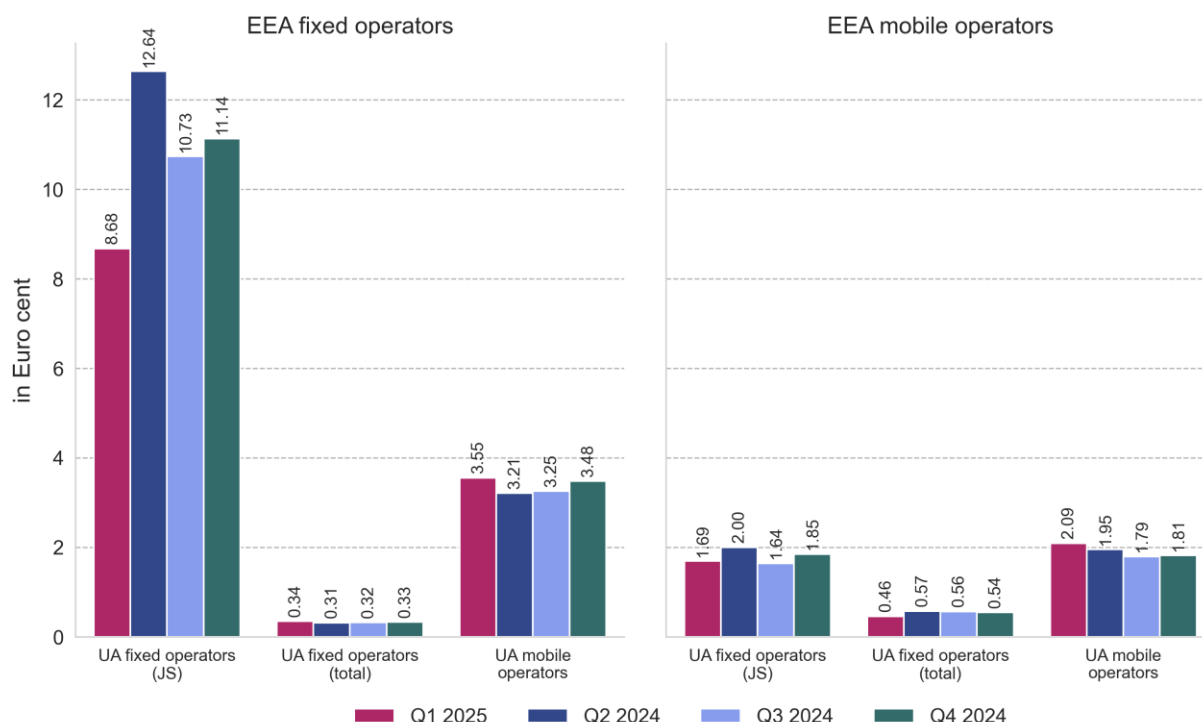


Figure 2: EEA weighted average termination revenues per minute for termination minutes originated in UA (varying number of replies for each set of bars, from left to right, $n=[6, 15, 14, 8, 25, 27]^6$).

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.

⁶ 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 it was not technically possible for them to distinguish between signatories and non-signatories in UA fixed networks. Figure 3 shows that the differences in bar heights disappear once the sample is kept constant over type of UA operator.

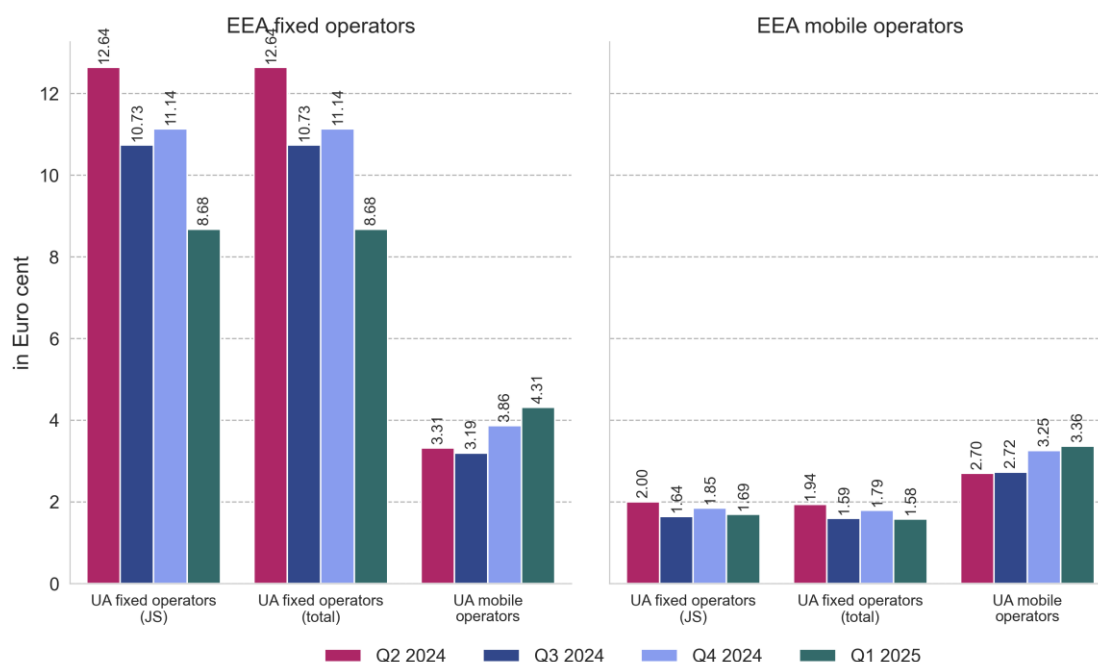


Figure 3: EEA weighted average termination revenues per minute for termination minutes originated in UA using only information from EEA operators who filled in all information, n=5 for fixed operators, n=8 for mobile operators.

2.1.3. Comparison of average payments with average revenues



Figure 4: 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=[4, 10, 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.

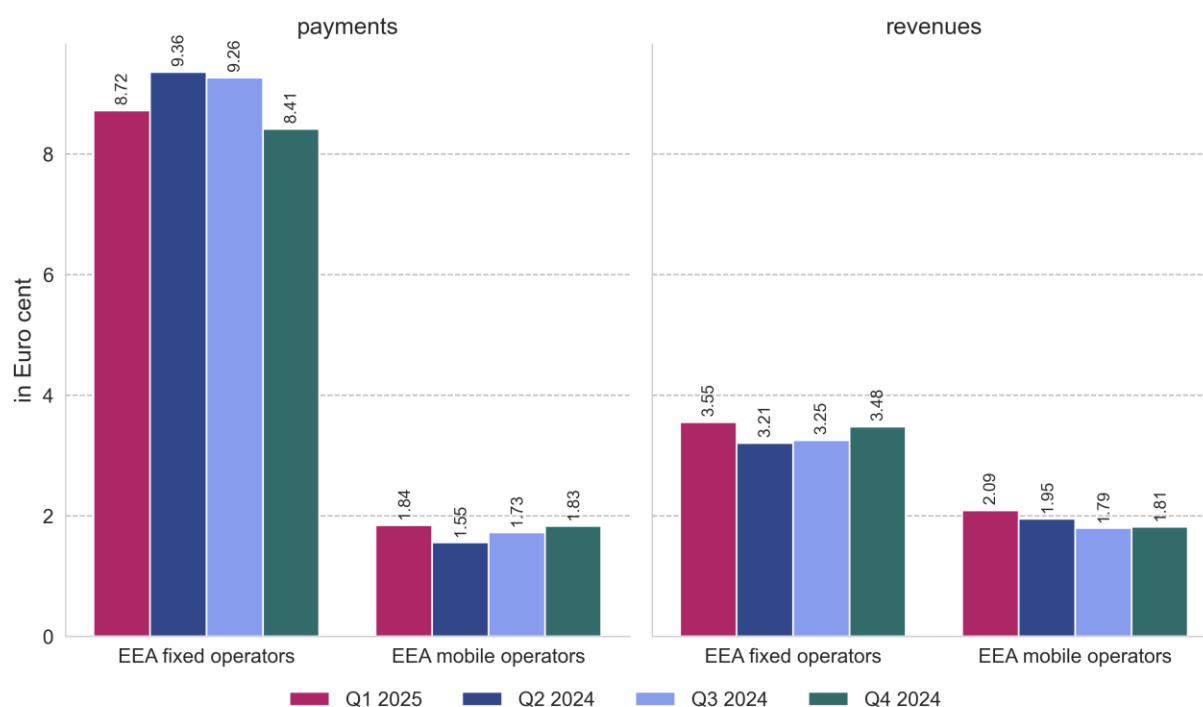


Figure 5: Weighted average termination rates paid and charged by EEA operators (fixed and mobile) to UA mobile operators (JS signatories) for termination (varying number of replies for each set of bars, from left to right, $n = [21, 43, 14, 27]$). Please note that the single maximum Union-wide mobile 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

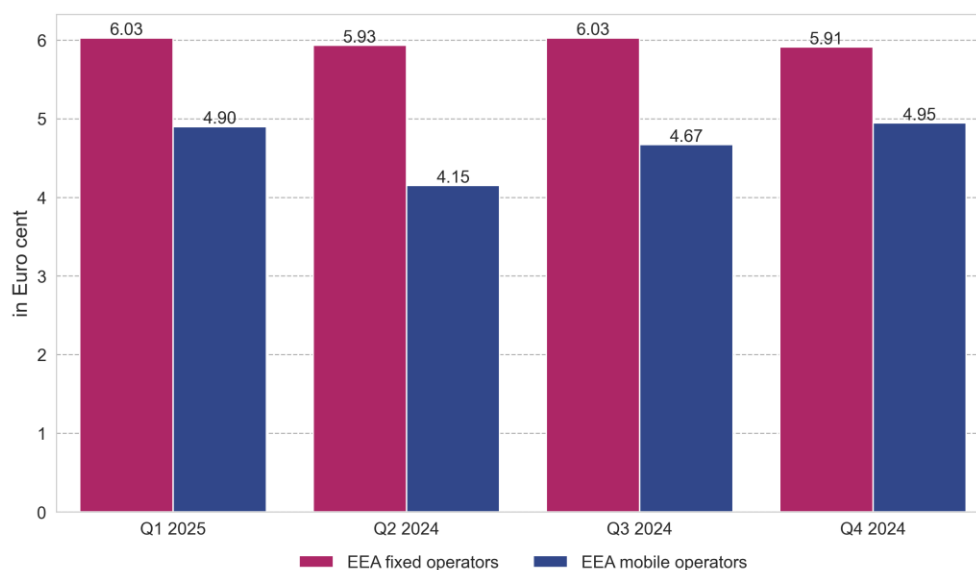


Figure 6: Weighted average transit rates paid by EEA operators (fixed and mobile) (n=11 EEA fixed operators and 14 EEA mobile operators). Please note that two mobile and one fixed operator reported transit rates of zero. These are included in the calculation.

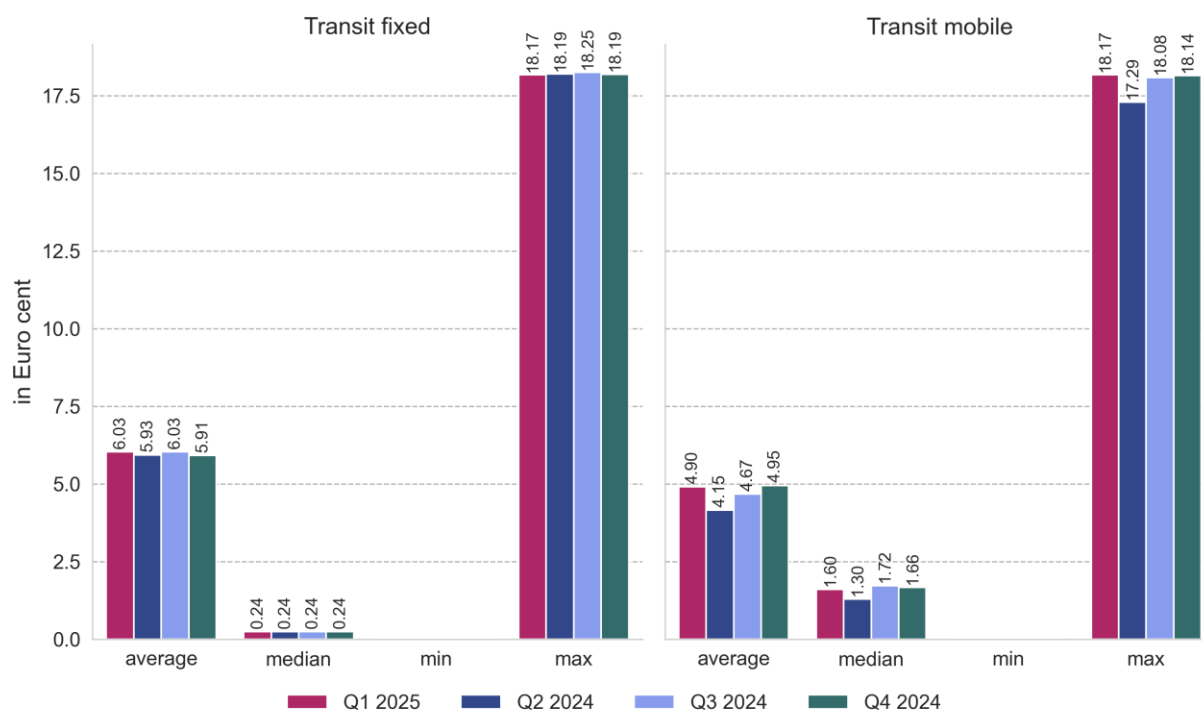


Figure 7: Transit rates paid by EEA operators (average, median, minimum and maximum) (n=11 EEA fixed operators and 14 EEA mobile operators).

2.3. Wholesale roaming

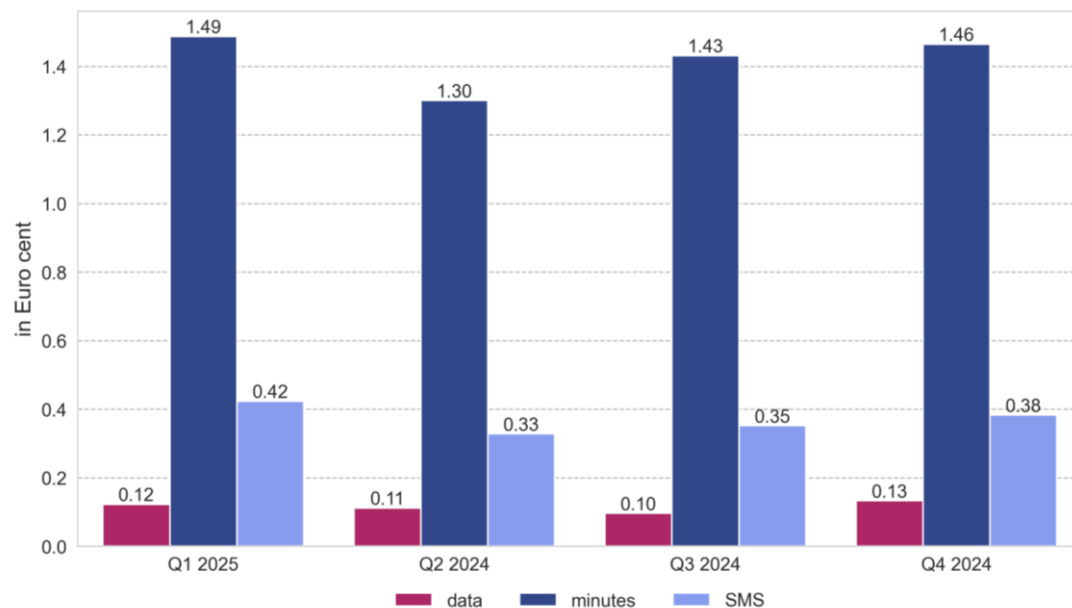


Figure 8: Weighted average wholesale roaming revenues per unit received by EEA operators from UA operators per GB, minute and SMS (varying number of replies for each unit type, data [n=45], SMS [n=46], minutes [n=47])⁷. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute (1.9 Eurocent per minute since 1 January 2025), 0.4 Eurocent per SMS (0.3 Eurocent per SMS since 1 January 2025) and 1.55 Euros per GB (1.3 Euros per GB since 1 January 2025).

⁷ 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

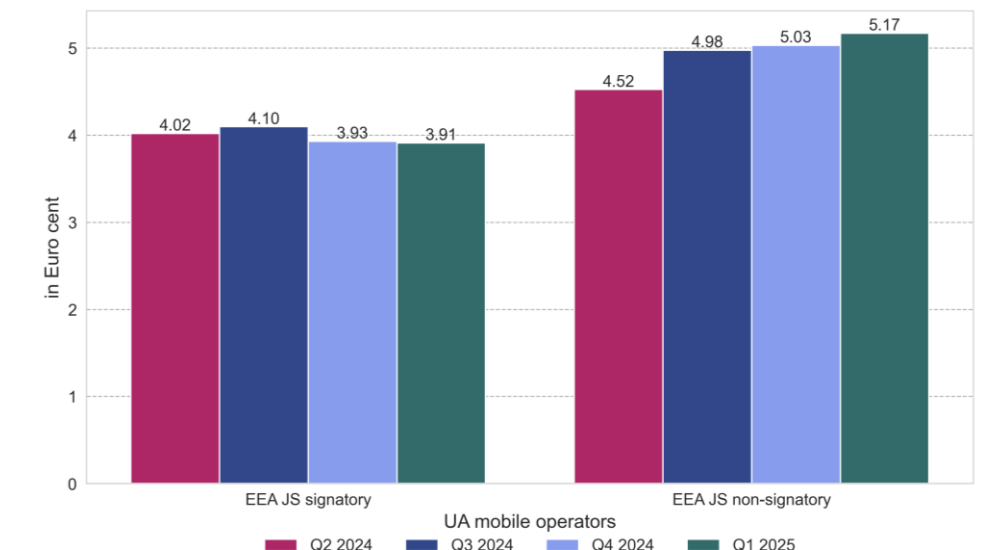


Figure 9: Weighted average termination rates paid by UA operators (mobile) for terminating minutes in fixed networks in the EEA (signatories of the Joint Statement vs. non-signatories). For confidentiality reasons, UA fixed operators were removed from the figure, n=3 mobile operators. Please note that 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.

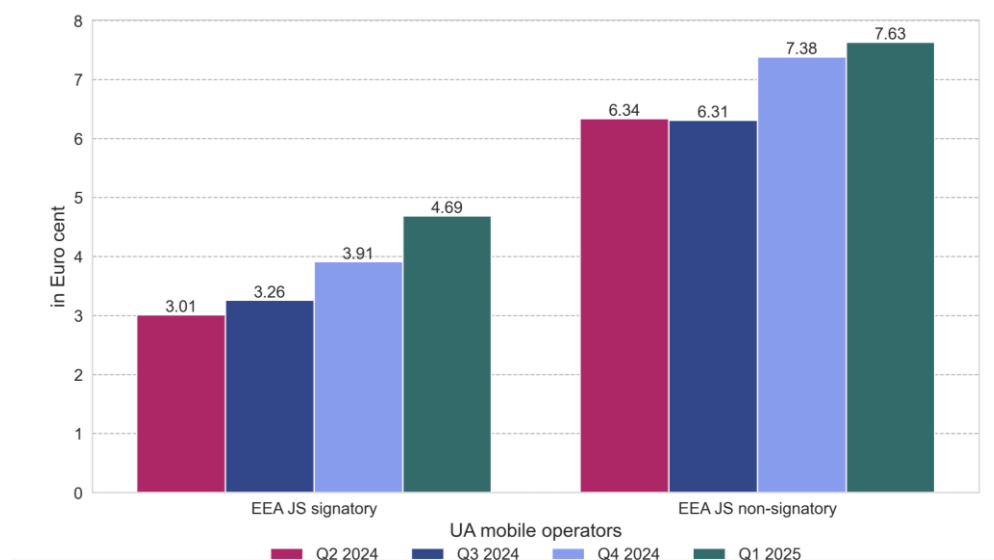


Figure 10: Weighted average termination rates charged by UA mobile operators for terminating minutes originated by EEA fixed operators (signatories of the Joint Statement vs. non-signatories) (n=3 UA mobile operators). Please note that the single maximum Union-wide mobile voice termination rate is 0.2 Eurocent per minute and the single maximum Union-wide fixed voice termination rate is 0.07 Eurocent per minute.

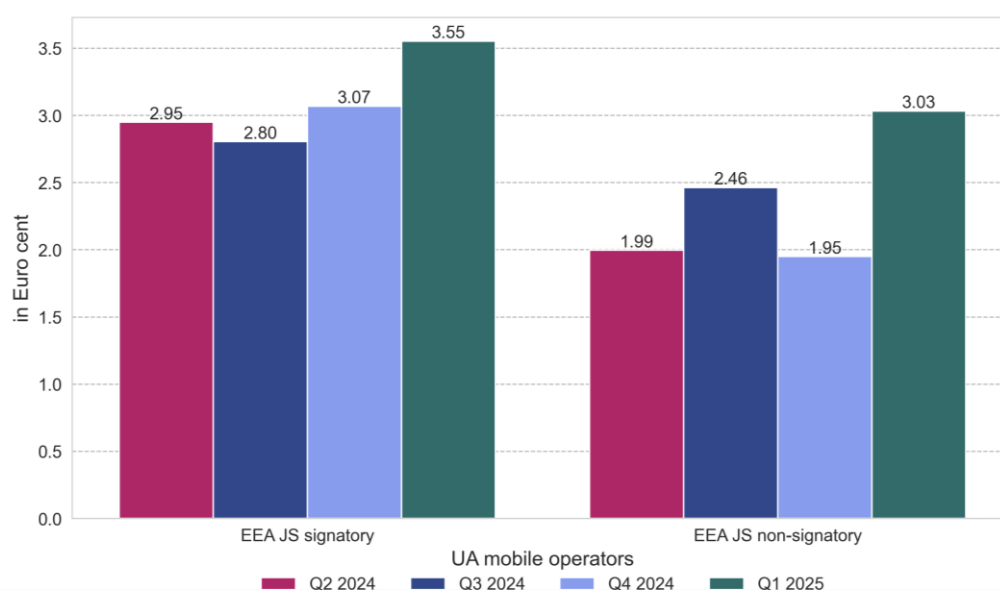


Figure 11: Weighted average termination rates paid by UA mobile operators for terminating minutes in mobile networks in the EEA (signatories of the Joint Statement vs. non-signatories) (n=4 UA mobile operators). For confidentiality reasons, UA fixed operators were removed from the figure. Please note 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.⁸

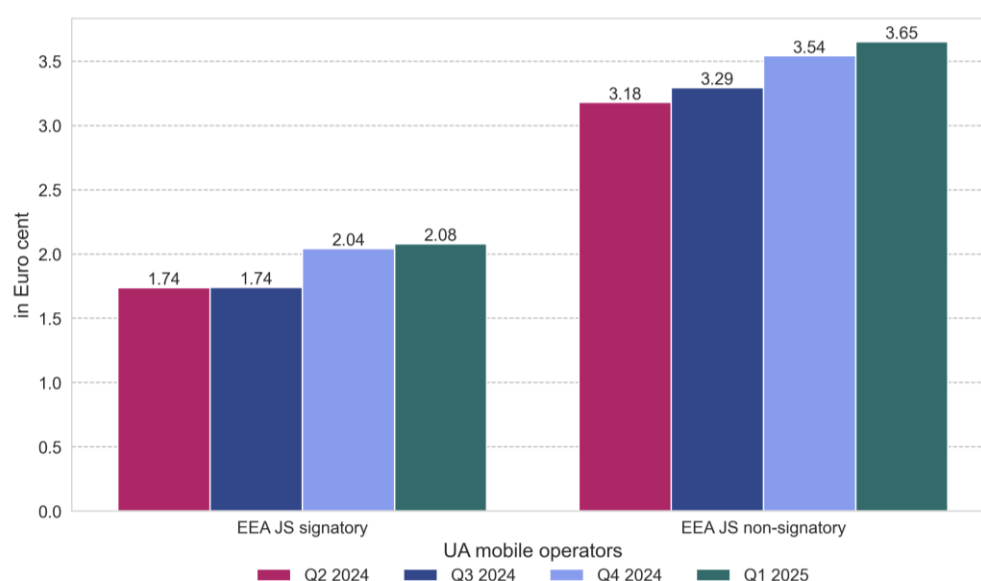


Figure 12: Weighted average termination rates charged by UA mobile operators for terminating minutes originated by mobile EEA operators (signatories of the Joint Statement vs. non-signatories).⁹

⁸ Two out of four mobile operators report higher termination rates for signatories than for non-signatories which is reflected in the average rates. The data has been confirmed by the operators.

⁹ UA fixed operators did not provide data on revenues from fixed termination rates charged to mobile EEA 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.

3.2. Transit

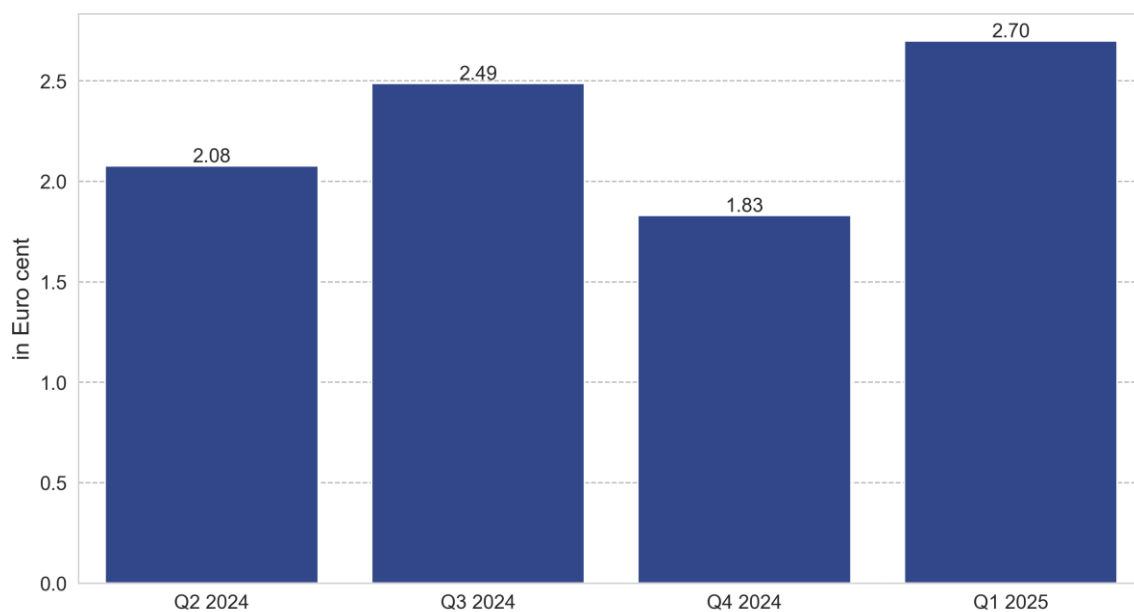


Figure 13: Weighted average transit rates paid by UA operators (mobile). For confidentiality reasons, UA fixed operators were removed from the figure.

3.3. Wholesale roaming

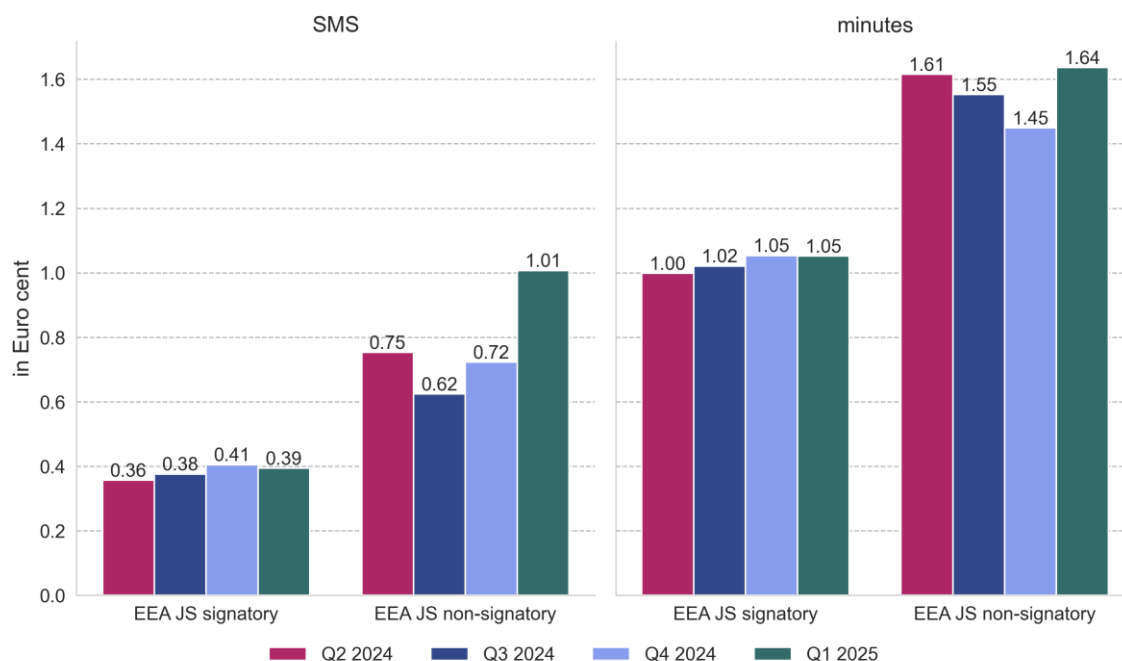


Figure 14: Weighted average rates paid by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming SMS and minute. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute (1.9 Eurocent per minute since 1 January 2025) and 0.4 Eurocent per SMS (0.3 Eurocent per SMS since 1 January 2025).

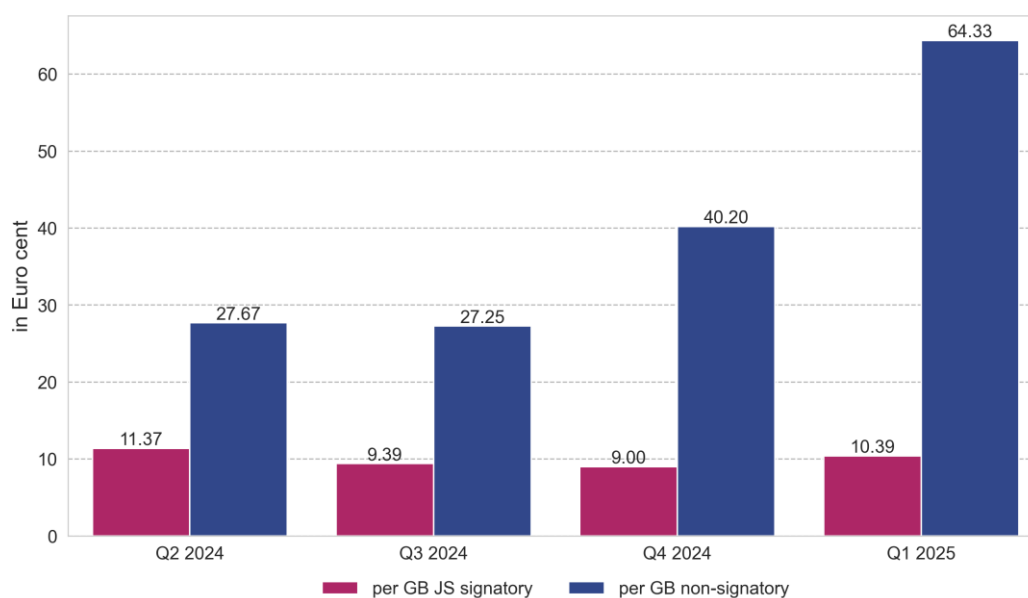


Figure 15: Weighted average rates paid by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming GB. Please note the regulated wholesale roaming caps at EU level are 1.55 Euros per GB (1.3 Euros per GB since 1 January 2025).

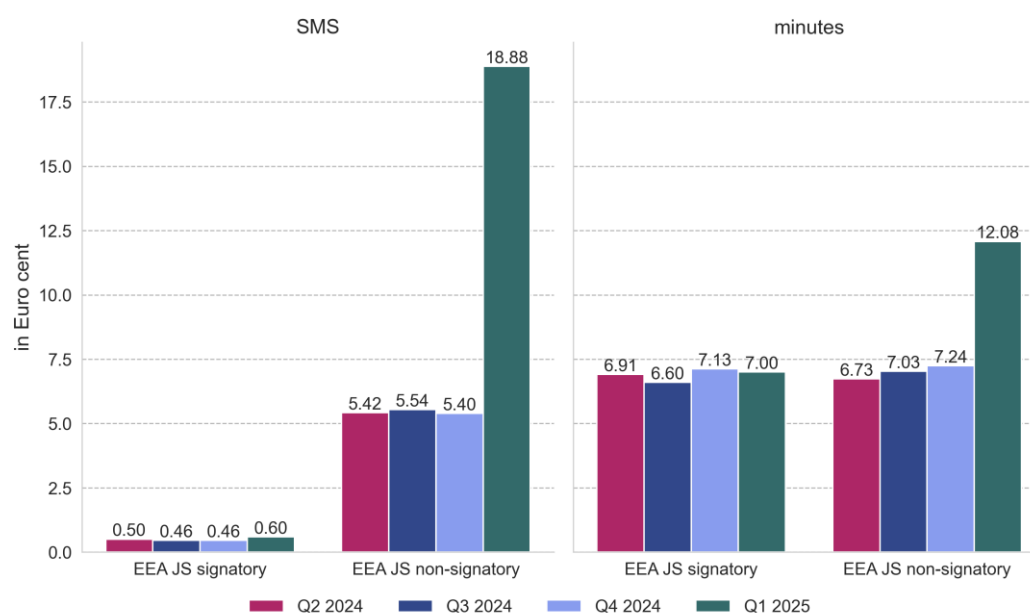


Figure 16: Weighted average rates charged by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming SMS and minute. Please note the regulated wholesale roaming caps at EU level are 2.2 Eurocent per minute (1.9 Eurocent per minute since 1 January 2025), 0.4 Eurocent per SMS (0.3 Eurocent per SMS since 1 January 2025).¹⁰

¹⁰ Data for Figure 16 show indeed that the reported average rates charged in Q2 2024 are higher for JS signatories than for non-signatories. One out of three operators showed very high roaming rates charged in Q1 2025. According to the operator, the elevated rates can be attributed to increased commitments with operators in 2025 as compared to 2024.

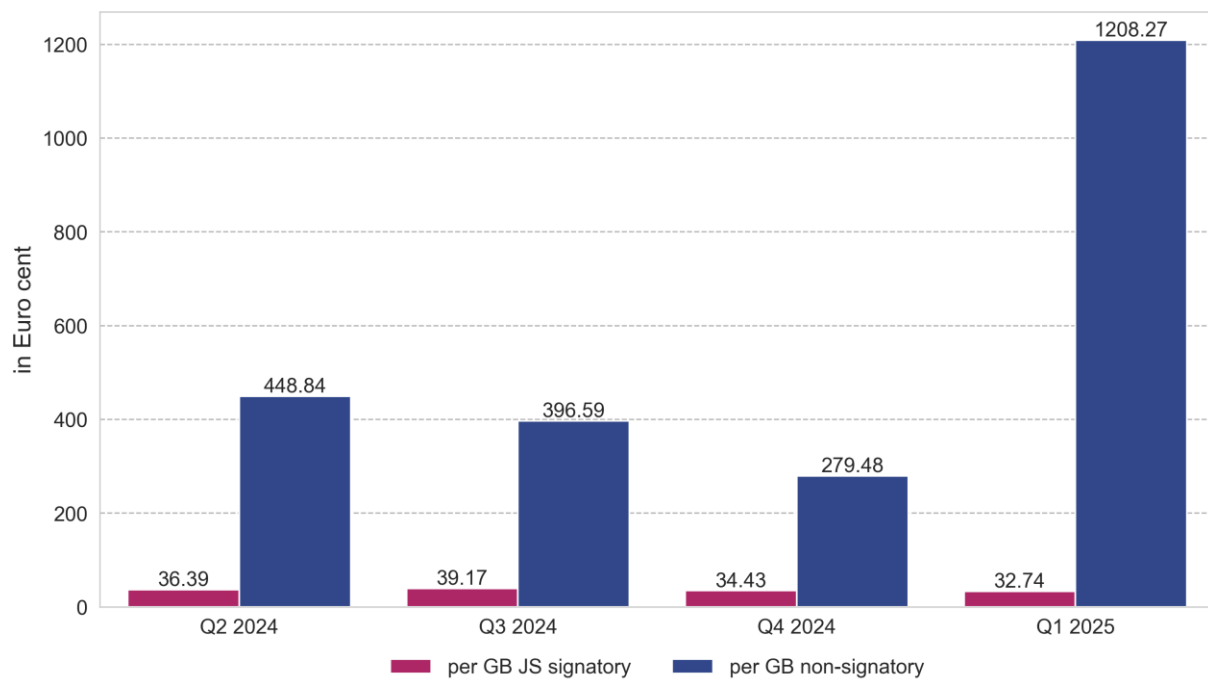


Figure 17: Weighted average rates charged by UA operators to EEA operators (signatories of the Joint Statement and non-signatories) per wholesale roaming GB. Please note the regulated wholesale roaming caps at EU level are 1.55 Euros per GB (1.3 Euros per GB since 1 January 2025).¹¹

¹¹ One out of three operators showed very high roaming rates charged in Q1 2025. According to the operator, the elevated rates can be attributed to increased commitments with operators in 2025 as compared to 2024.

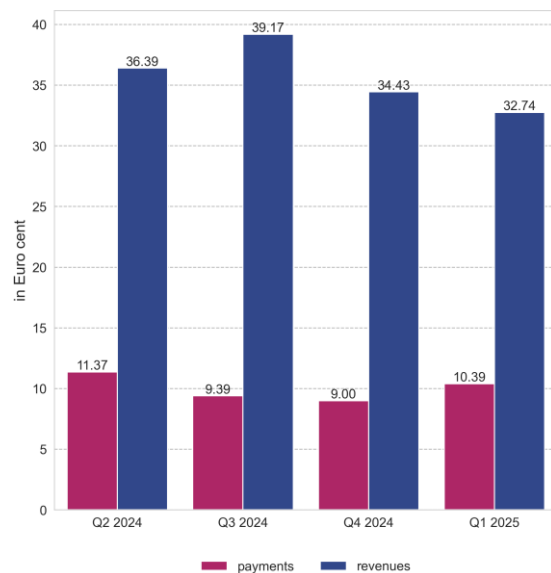


Figure 18: Comparison of wholesale roaming payments and revenues of UA operators per GB (only through EEA operators that signed the Joint Statement). EU regulated rate = 1.55 Euro per GB (1.3 Euros per GB since 1 January 2025).

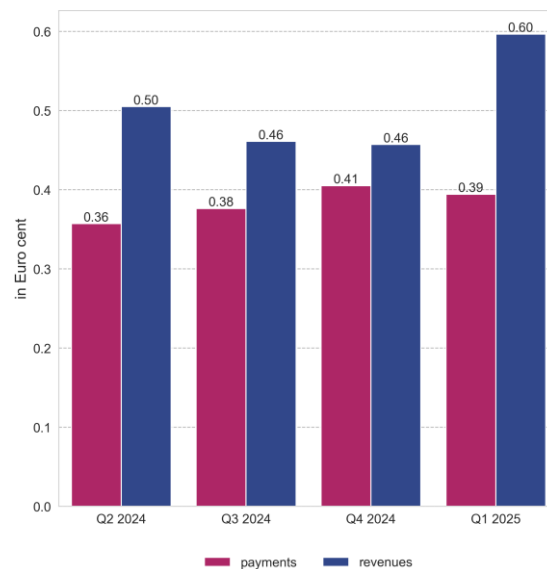


Figure 19: Comparison of wholesale roaming payments and revenues of UA operators per SMS (only through EEA operators that signed the Joint Statement). EU regulated rate = 0.4 Eurocent per SMS (0.3 Eurocent per SMS since 1 January 2025).

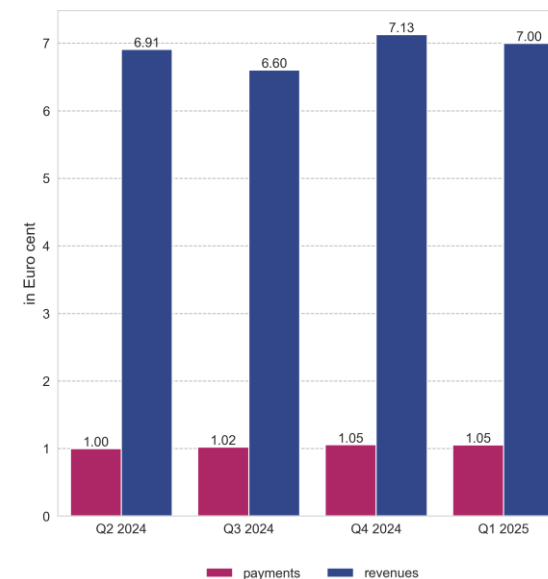


Figure 20: Comparison of wholesale roaming payments and revenues of UA operators per minute (only through EEA operators that signed the Joint Statement). EU regulated rate = 2.2 Eurocent per minute (1.9 Eurocent per minute since 1 January 2025).

4. Traffic volumes

Figure 21 shows that roaming data volumes for UA subscribers roaming in the EEA exceed roaming volumes from EEA subscribers roaming in UA by factors of 8,097- 11,547, while roaming minutes for UA subscribers in the EEA exceed roaming minutes from EEA subscribers in UA by factors of 75 to 89.

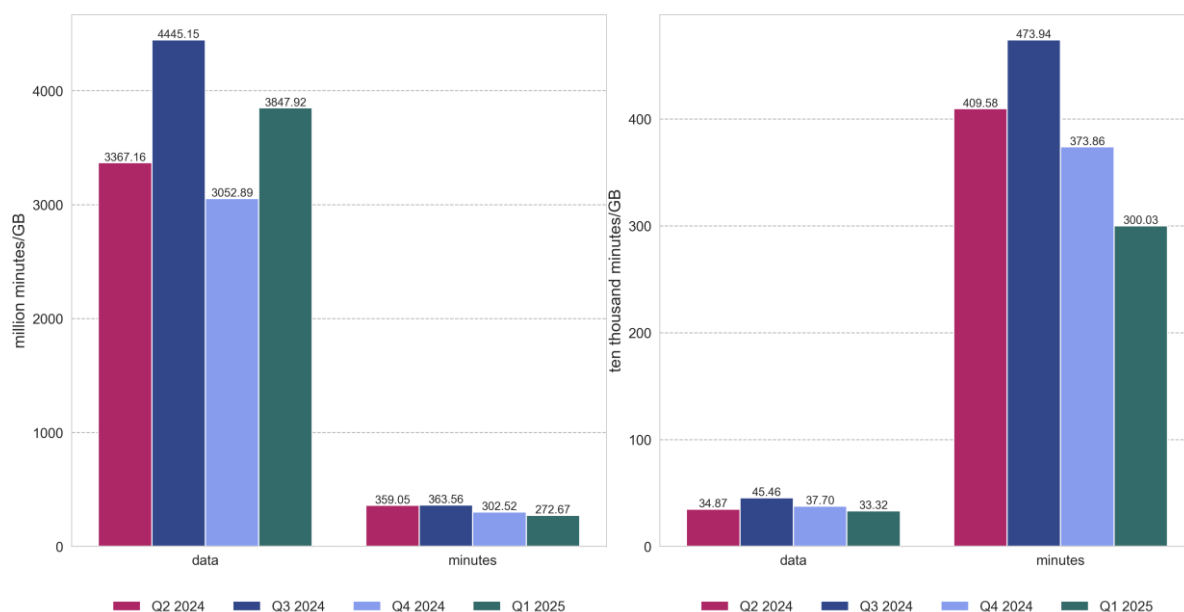


Figure 21: Wholesale roaming volumes in GB/minutes for UA subscribers in the EEA (left panel) and EEA subscribers in UA (right panel). Please note the different scales in the graphs (millions vs ten thousands). The graphs on the left panel are based on the data provided by EU operators.

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 22.

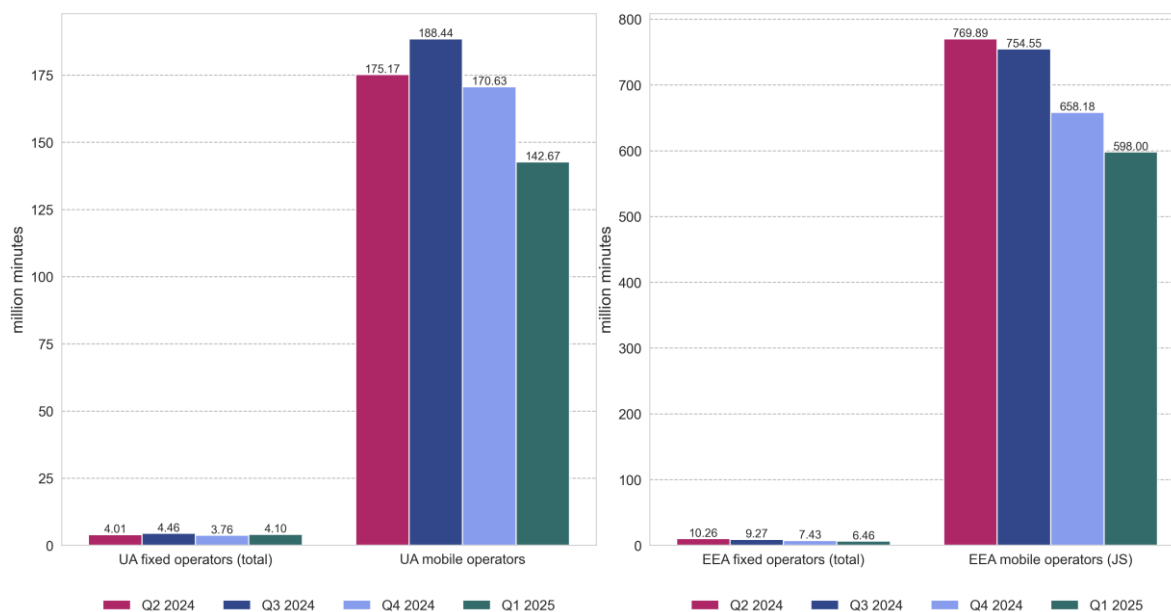


Figure 22: Voice termination volumes for termination in UA networks reported by EEA operators (left panel) and voice termination volumes in EEA networks reported by UA operators (right panel).¹² Please note the different scales in the graphs (up to 189 mio vs up to 770 mio).

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. If only signatories were reported, the figures would be slightly lower in the first graph of the right panel.

5. Summary of answers to qualitative questions

5.1. EEA operators

5.1.1. Fraud

Respondents from the majority of countries reported none or no significant fraud cases related to the implementation of the JS, using replies such as “no”, “none observed”, “not detected”, or “not that we are aware of”. A total of 49 operators across 18 countries reported no fraud cases.

A total of 9 operators across 5 countries reported fraud cases. In particular, some observed the use of SIM cards within SIM Box or Fixed Cellular Terminal (FCT) devices, which are used to bypass international termination charges by routing traffic through local mobile networks. One operator noted that this type of activity had decreased since early 2023.

A few responses also mentioned prepaid SIM cards being used to reroute traffic – suggesting limited misuse rather than systemic abuse. Additionally, one operator reported detecting spoofed CLI (Calling Line Identification), though this was not explicitly tied to the Joint Statement.

One observation referred to a rise in traffic directed at Ukrainian fixed-line prefixes, potentially hinting at abnormal routing patterns, though these were not clearly defined as fraudulent.

Overall, while isolated issues were mentioned, respondents generally indicated that these cases were rare and comparable to fraud patterns seen in other international contexts, rather than specific to JS-related cooperation with Ukrainian operators.

A total of 54 operators across 19 countries have reported implementing measures to combat fraud, with 38 from mobile operators and 16 from fixed operators, while only 2 mobile operators and 1 fixed operator indicated they had not implemented any anti-fraud measures.

Most respondents confirmed that they have implemented either standard or enhanced measures to monitor and prevent fraud. A wide range of tools and processes were reported, including 24/7 traffic surveillance through Fraud Management Systems (FMS), real-time detection of irregular or high-volume traffic – particularly involving routes to and from Ukraine – and the monitoring of SIM card activity with mechanisms in place to suspend suspicious numbers.

Several operators noted the use of direct routing agreements with Ukrainian operators to avoid third-party intermediaries and reduce exposure to fraudulent manipulation. Monitoring of International Premium Rate Numbers (IPRN) was also highlighted, alongside the deployment of automated alarms, traffic analytics, and broader fraud risk management systems. Routine

reconciliation of call volumes and threshold-based alerting for Ukraine-specific traffic was a common part of the operational setup.

In addition to these core measures, some operators have developed more targeted approaches, such as implementing custom detection rules for premium number abuse, producing monthly traffic reports, tracking geographic usage indicators (KPIs), and maintaining alert systems specifically focused on potentially fraudulent Ukrainian number ranges.

For others, fraud prevention remained embedded within general procedural frameworks. Respondents in this group referred to the use of “standard monitoring tools,” centralized network security processes, and the application of existing anti-fraud mechanisms that are applied uniformly across markets – including Ukraine. In these cases, no separate or Ukraine-specific enhancements were introduced, though continuous monitoring remained in place.

A small number of operators reported that no additional measures were deemed necessary, either due to the absence of detected fraud or because general systems were considered sufficient. A few explicitly mentioned relying on fraud infrastructure already maintained by their mobile divisions, reflecting shared technological capabilities across service types.

In summary, while the scale and sophistication of measures vary, the majority of operators are actively engaged in monitoring and mitigating fraud risks, particularly those associated with increased traffic volumes linked to Ukraine. Even where customized systems are not in place, most rely on automated, near real-time tools and are prepared to respond swiftly to emerging threats.

A total of 30 operators across 13 countries, comprising 21 mobile operators and 9 fixed operators, reported no financial impact due to fraud. Meanwhile, 4 operators across 2 countries, reported a financial impact.

Only a few operators were able to quantify losses. Among these, individual reports referenced monthly or annual figures ranging from several thousand euros, typically tied to specific types of fraudulent activity such as Fixed Cellular Terminal (FCT) misuse. A small number of entries also included raw figures without units or context, suggesting that even when losses occurred, they were either not substantial or not systematically tracked.

Some operators described the financial impact as negligible or very limited, indicating that while fraud is being monitored, it does not present a significant revenue risk under current circumstances.

In conclusion, the financial consequences of fraud related to Ukraine or the Joint Statement appear to be minimal for the majority of respondents. Isolated cases exist, but overall,

operators either did not detect losses, chose not to evaluate them in detail, or found the scale of any impact to be insignificant.

5.1.2. Obstacles

The majority of respondents reported no significant obstacles, with many describing smooth cooperation or noting that the necessary rate reductions had already been implemented without major friction.

At the same time, a number of respondents indicated that some Ukrainian operators, particularly Kyivstar and Lifecell, appeared to be taking a different approach to the implementation of the Joint Statement. Concerns raised included limited willingness to reduce termination rates, a preference for refugees to remain on Ukrainian SIMs while roaming, and isolated instances of roaming restrictions.

Some operators also highlighted structural limitations, such as the lack of direct interconnection with Ukrainian networks, relying instead on transit providers, which reduces the ability to negotiate or influence pricing directly. A few mentioned technical challenges in their billing systems that prevent unilateral adjustments to pricing, while others pointed to the complexity of contractual negotiations and testing processes on the Ukrainian side.

In terms of risk management, spoofed CLI (Calling Line Identification) and potential misuse were cited as concerns, particularly if termination rates were reduced asymmetrically.

Finally, several respondents noted that mobile termination rates (MTRs) in Ukraine remain significantly above EU-regulated levels—up to three times higher in some cases. This discrepancy has a direct impact on the feasibility of lowering retail roaming rates, especially for calls to Ukraine, where the difference between inbound and outbound termination charges remains substantial (e.g., €0.25/min vs. €0.0023/min).

5.1.3. Benefits of the reduction of termination rates to the customers

A clear majority of respondents indicated that they have passed on the benefits of reduced termination rates to their customers. Many confirmed this through specific actions such as offering discounted tariffs, free or subsidized call and data packages, and public communication via SMS notifications or website updates.

Operators provided a range of examples, including monthly minute allowances for international calls to Ukraine, free SIM cards, and data bundles tailored to the needs of Ukrainian customers, particularly refugees. In several cases, special tariffs were created to reflect the reduced wholesale costs, often aligning international calling rates with those applied to the European Economic Area.

These efforts were implemented through a variety of models, including both prepaid and postpaid offers. Communication with affected customer groups was typically proactive, ensuring transparency around the changes.

At the same time, some respondents noted that the full extent of retail rate reductions has been influenced by external constraints. Not all Ukrainian operators have reduced their termination rates, which for some made it challenging or impractical to reflect corresponding changes in retail pricing. In a few cases, adjustments were limited to mobile services, as the cost and complexity of updating fixed-line billing systems outweighed the expected benefits due to low usage volumes.

Only a small number of operators indicated that they had not passed on these benefits fully, citing reasons such as technical limitations, market structure, or broader commercial pricing strategies that are applied at the country level rather than per destination.

Overall, most operators have made clear efforts to transfer wholesale cost reductions to their customer base. While some limitations remain due to uneven conditions at the wholesale level, the general approach reflects a strong willingness to support affordability and maintain customer-friendly pricing during a period of heightened sensitivity.

5.1.4. Suggestions for further improvement of the Joint Statement

The majority of respondents offered no additional remarks regarding the Joint Statement. Phrases such as “no”, “no comment”, or “not applicable” were common, suggesting that most operators did not have further concerns or observations to share beyond what was already covered in their responses.

Among those who did provide comments, several recurring themes emerged. A number of respondents expressed the view that a more symmetrical application of EU-regulated termination rates by Ukrainian operators would be necessary to ensure balanced outcomes. It was noted that some mobile termination rates (MTRs) in Ukraine have remained unchanged since 2022, particularly for cross-network calls, which are still perceived as relatively high.

While most feedback avoided naming specific entities, a few respondents observed that certain operators – both mobile and fixed – appeared to be progressing at different paces in terms of alignment with the Joint Statement’s objectives. These comments reflected a broader perception that full implementation may not yet be uniform across all participants.

Some operators suggested that the Joint Statement could be strengthened by encouraging greater transparency in how regulated termination rates and related markups are applied. One contribution proposed a “glide path” model, similar to that used within the EU framework, for gradually adjusting rates – while also emphasizing that, in the context of future EU membership for Ukraine, full alignment with EU rules should apply without delay.

Additional feedback touched on the technical aspects of data reporting, including the use of forecasts and how different types of voice traffic were categorized in submissions. These

nuances were mentioned to clarify the interpretation of some figures and ensure consistency in reporting practices.

In summary, while most operators had no further comments, those who did respond highlighted themes of alignment, transparency, and implementation consistency – offered in the spirit of constructive engagement and shared commitment to long-term cooperation.

5.1.5. Voluntary measures

A significant number of operators described a wide range of voluntary retail-level initiatives introduced in response to the war in Ukraine. These efforts were most prominent in 2022 and 2023, with many still ongoing in various forms as of 2024.

One of the most common measures was the provision of free or heavily discounted international calls and SMS to Ukraine. These were offered to both prepaid and postpaid customers, particularly during the early months of the crisis. While fully free offers gradually transitioned to discounted models, the intent to support remained strong. Many operators offered targeted packages—such as fixed-rate call bundles (e.g., 1000 minutes/month) or international tariffs aligned with EEA pricing levels.

Another frequently reported initiative was free or discounted roaming in Ukraine, which covered voice, SMS, and data traffic. In most cases, roaming traffic from and to Ukraine was zero-rated through 2022 and 2023, with some operators extending the benefit into mid-2024. Later, these measures were replaced by capped or EU-aligned retail roaming rates.

A particularly visible gesture of support was the mass distribution of free SIM cards to Ukrainian refugees. These often came preloaded with data and minutes, such as 10–30 GB of mobile data and hundreds of minutes for international communication. Many operators also partnered with humanitarian organizations such as the Red Cross and Caritas, or worked with national governments to ensure effective delivery of services.

In addition to direct telecom support, some operators launched “Ukraine special tariffs” or bundles combining voice, data, and messaging at symbolic prices. A few providers also tied offers to broader charitable efforts, such as donating TV subscription revenue, offering hardware and internet to refugee centers, or supporting psychological and legal support services for displaced persons.

The evolution of these offers followed a clear timeline:

- Initial phase (Feb–May 2022): Full gratuity of services across networks.
- Mid-phase (2023): Gradual transition to affordable fixed-price offers.
- Current phase (2024): Continued targeted support, often focused on verified Ukrainian users or refugees, typically in the form of discounted rates rather than entirely free access.

While both mobile and fixed operators demonstrated engagement in voluntary measures, there was a clear distinction in scope and visibility. Mobile operators were generally more active in launching public-facing initiatives, including SIM distributions, bundled voice/data offers, and communication campaigns. Fixed operators, by contrast, contributed in more indirect ways, such as through VoIP tariff adjustments, connectivity support for refugee infrastructure, or integration into broader national relief frameworks. This difference reflects the natural variation in service roles and customer reach between the two segments.

Only a handful of respondents indicated that they had not implemented any specific measures. Even among these, however, participation in SIM distribution or adjustments to international pricing structures was often implied.

The telecommunications sector has shown considerable goodwill and flexibility in response to the humanitarian crisis, acting swiftly to offer practical, meaningful support. From fully free services to sustainable, affordable packages, most operators continue to maintain their commitment to affected users with dedicated tariffs, infrastructure support, and customer-focused initiatives well into 2024.

5.2. UA operators

5.2.1. 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.

5.2.2. Fraud measures

Several respondents mentioned implementing fraud detection and prevention by employing 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.

5.2.3. Fraud impact

One operator stated that the financial impact due to fraud amounted to approximately 55,000 USD per month, with an estimated reduction of more than 30% for the first quarter of 2025. 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. Obstacles

Some operators mentioned that high Mobile Termination Rates (MTR) and Fixed Termination Rates (FTR) among EU and Ukrainian operators form an obstacle. According to the data of Ukrainian operators, the effective termination rate in the networks of European mobile operators is constantly growing, for example, under current monitoring period, the termination rate has increased by 20%. In some cases, lack of direct interconnections between all signatories of the Joint Statement also results in non-reduction of termination rates. One operator mentions that the current routing settings are inflexible and prevent the implementation of interconnection (IC) conditions that involve a breakdown into a significant amount of A-numbers.

5.2.5. 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.

5.2.6. Suggestions for further improvement of the Joint Statement

UA operators request a prolongation of the JS, one specifically mentioning that it would be preferable if the JS was to be extended until the regulation is implemented.

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

iso code	Country	EEA fixed operators	EEA mobile operators	Sum
AT	Austria	0	2	2
BE	Belgium	2	3	5
BG	Bulgaria	1	1	2
CZ	Czech Republic	0	2	2
DE	Germany	3	3	6
DK	Denmark	0	1	1
ES	Spain	2	4	6
FI	Finland	0	2	2
FR	France	2	2	4
GR	Greece	3	3	6
HR	Croatia	2	2	4
HU	Hungary	1	1	2
IE	Ireland	2	2	4
IT	Italy	3	4	7
LT	Lithuania	0	1	1
MT	Malta	1	1	2
PL	Poland	1	4	5
PT	Portugal	2	2	4
RO	Romania	2	3	5
SE	Sweden	0	2	2
SI	Slovenia	0	1	1
SK	Slovakia	1	2	3
Total		28	48	76