UKRAINIAN INTERNET ASSOCIATION
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Mr. Hans Petter Holen, RIPE NCC CEO
The Réseaux IP Européens Network Coordination Centre
11 Stationsplein 1012 AB Amsterdam
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RIPE NCC board

RIPE NCC members

Subject: Request to Reconsider Proposed Increase of PI Resource Annual Fee

Ref. № 18
March 10, 2026

<div align="center">

Dear Members of the Executive Board,

Dear Mr Holen,

Dear RIPE Chair,

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The Ukrainian Internet Association (UIA), which unites over 200 enterprises in the field of electronic communications, would like to express its concern regarding the proposal to increase the annual fee for Provider Independent (PI) resources from EUR 75 to EUR 1,000, which is expected to be considered at the upcoming General Meeting of the RIPE NCC in May 2026.

While we fully recognize the importance of ensuring the long-term financial sustainability of RIPE NCC, the proposed thirteen-fold increase raises concerns regarding its potential unintended consequences, particularly for organisations operating in Ukraine under the extraordinary circumstances of the ongoing war.

Provider Independent resources are widely used by Ukrainian organisations—including regional Internet service providers, data centres, public institutions, educational networks and operators supporting critical infrastructure—to maintain routing independence and multi-homing capabilities. These characteristics have proven essential for maintaining connectivity during repeated disruptions to telecommunications infrastructure caused by military attacks.

The Ukrainian electronic communications market also has a specific structural characteristic that should be taken into account when considering changes to the PI fee model. Currently, approximately **317 organisations in Ukraine hold LIR status**, while around **1,100 organisations hold PI address space without being LIRs**. As a result, the number of organisations relying on PI resources is **more than 3.5 times higher than the number of LIRs**.

This ratio appears to be unique within the RIPE NCC service region and reflects the highly decentralised structure of Ukraine's Internet ecosystem. In practice, PI resources enable a large number of independent operators and institutions to maintain routing autonomy and network resilience. This decentralised architecture has proven particularly valuable during the ongoing military aggression

against Ukraine, allowing operators to reroute traffic and sustain connectivity despite infrastructure damage.

At the same time, such a structure means that sharp increases in PI resource fees may have a **disproportionate impact** on Ukrainian organisations compared to many other parts of the RIPE NCC service region. Many small and regional operators already face significant financial pressure due to the war and the cost of restoring damaged infrastructure.

We also believe that proposals introducing such a significant structural change to the contribution model would benefit from broader consultation within the RIPE community. Given the scale of the proposed increase and the potentially uneven impact across the service region, additional dialogue with affected stakeholders could help ensure that any future adjustments to the charging model are perceived as balanced, proportionate and consistent with the community-driven governance principles that have long been a cornerstone of the RIPE ecosystem.

In light of the above, we respectfully request the Executive Board to consider **removing the proposed increase of PI resource fees from the agenda of the upcoming May 2026 General Meeting** in order to allow for broader consultation with the RIPE community and affected stakeholders.

We would also encourage exploring alternative approaches to maintaining RIPE NCC's financial sustainability, including **measures aimed at improving the efficiency of the organisation's existing budget and resource utilisation**, alongside consideration of more gradual or balanced approaches to possible changes in the contribution model.

The Ukrainian Internet Association remains ready to contribute constructively to discussions aimed at identifying solutions that ensure the financial sustainability of RIPE NCC while preserving the stability, resilience and decentralised nature of Internet infrastructure across the RIPE service region.

We appreciate your attention to this matter and would welcome further dialogue.

Respectfully

Chairman of the Board
of UKRAINIAN INTERNET ASSOCIATION   **Oleksandr SAVCHUK**