Netnod Tech Meeting
2026

Internet Resilience in Ukraine

Eliza Rohotska, Axon Partners



Russia Is Planning Its Most Powerful Blow Yet to Try to Freeze Ukraine

Ukraine showed European partners what it said were intercepted Russian plans to cut off major cities from power, heat and water this winter.







“A SINGLE CATASTROPHE SHOCKS US
BUT REPEATED HORROR SLOWLY BECOMES NORMAL”



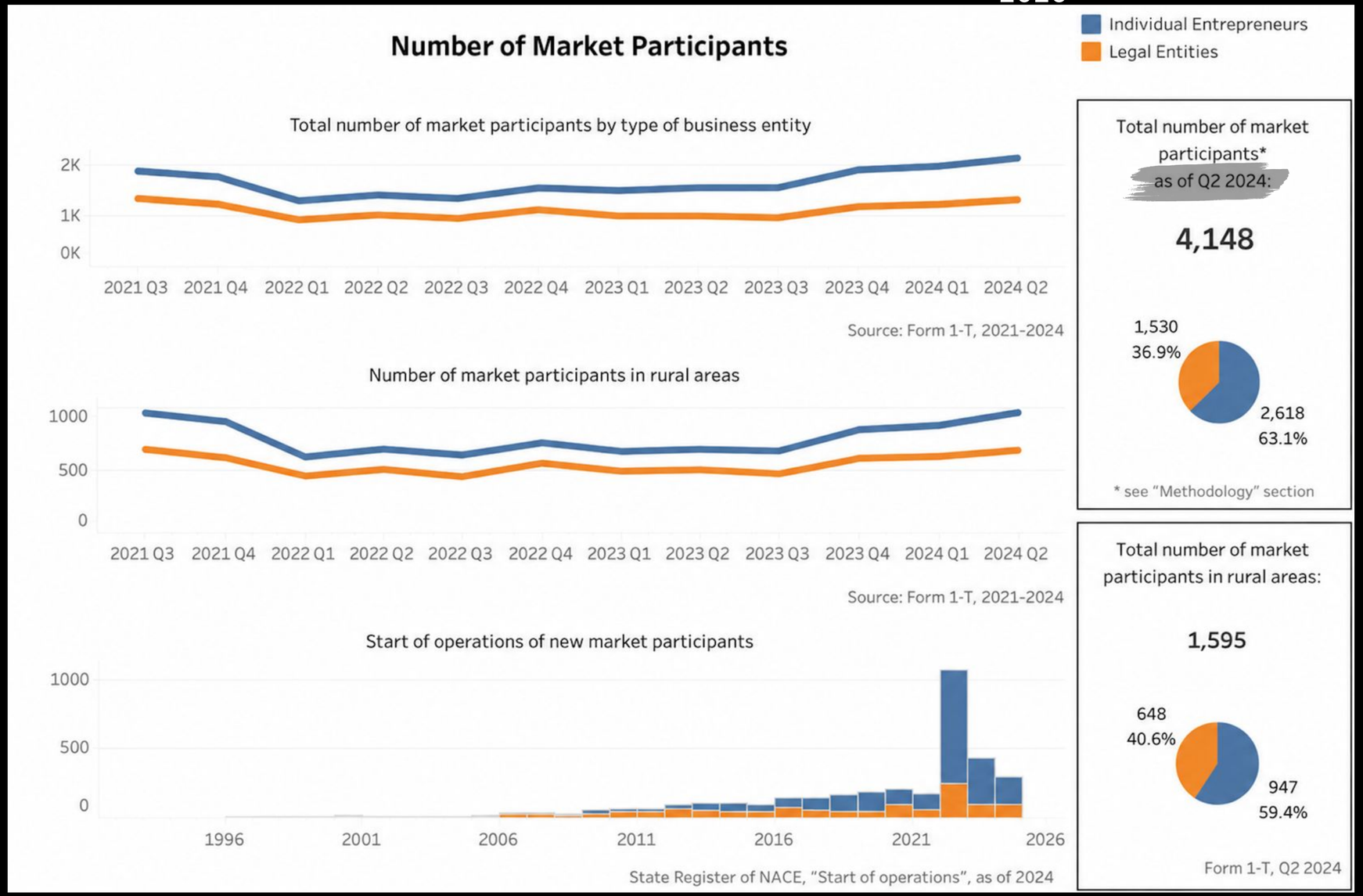


Agenda:

1. TELECOM MARKET IN UKRAINE
2. INTERNET RESILIENCE WITHIN UKRAINIAN LAW
3. TIMELINE & EU ACQUIS IMPLEMENTATION
4. ISPS TAXATION & MOBILIZATION ISSUES
5. STRIKING A BALANCE
6. DRAWING UP CONCLUSIONS

- 23 IXPs
- Decentralised market

- Q2 2026 - decreased to 3006 ISPs



Internet Resilience within Ukrainian Law

27.06.2025
Order No. 424/3225

Providers of electronic communication networks and/or services shall immediately ensure the provision of electronic communication services in compliance with the established quality indicators for the list of facilities, taking into account the possible absence of power supply at such facilities for at least three days.

1. 72 hours are a mandatory requirement
2. Not just the availability of batteries, but a full cycle of life support

Logistics?

Legal Changes Timeline

Law 2163-VIII on the basic principles of ensuring cyber security of Ukraine (2017)

Law 1089-IX on Electronic Communications (2020)

FEB 2022

Presidential Decree 802/2022 (Nov 2022)

- general requirement to adapt

Order No. 424/3225 (Jun 2025)

- specific operational rules

Law 2163-VIII Cybersecurity Law update (Oct 2025)

- NIS2 alignment

ISPs Taxation & Mobilization Issues

In September-October 2024, the State Tax Service (STS) began to abolish the simplified taxation system specifically for small business providers of fixed Internet access.

According to BRDO, almost 500 ceased operations right after the abolishment

Individual enterpreneurs are fully outside of the military ex echanism



Where is the balance?

CRITICAL INFRASTRUCTURE



HUMAN RESOURCES

Interview Quote

If there is no help from the government/donors or volunteers, how long will it take for your work to stop?

“We will keep going and enduring. Others will help us. We have invested a lot in our work, so it will be very painful to lose it”.

ISP from Kherson region (partially occupied)

Conclusions

1. PROTECT DECENTRALISATION
2. ADAPT EU ACQUIS, NOT COPY
3. SUPPORT SME SURVIVAL BY TOOLS AVAILABLE



UKRAINE AS A LABORATORY OF INTERNET RESILIENCE

Netnod Tech Meeting
2026

THANK YOU & LET’S KEEP UKRAINE Connected



Eliza Rohotska I 6 October