Ukraine: State of Affairs report

1. Country Snapshot

1.1 Internet Freedom State of Affairs

Ukraine has a relatively free environment from the Internet freedom viewpoint, but is seeing a decline in the past two years under the Freedom on the Net Index by Freedom House. The main area of concern is related to the continued fallout from the ongoing military conflict in the Donbass region with Russia-backed separatists and the standoff with Russia after loss of Crimea. Citizens and organizations face prosecution for online views evaluated as separatist, as new government policies are being introduced or contemplated opening way for removal, blocking and filtering of content and sanctioned mass surveillance of online communications by law enforcement agencies.

The market for Internet service provision is highly competitive and lightly regulated, with no state monopolies, and transparent management of access to spectrum. At the same time, the national infrastructure for Internet access has seen major underinvestment due to delayed allocation of spectrum licenses, and is far behind the technological trends dominant in neighboring geographies, reflected in comparatively low broadband penetration, even on mobile networks.

1.2 Brief Country Data

Ukraine is a semi-presidential republic in Eastern Europe, with population exceeding 42.6 million[1] and a territory of 603 thousand square kilometers[2]. The country's population is predominantly urban, with 69% of the population living in urban areas.[3] According to the last national census in 2001, the majority of Ukrainian citizens are ethnic Ukrainians, while a sizeable minority is estimated to be ethnic Russian.

Ukraine's economy is a market economy in transition, which has been traditionally reliant on industry and agriculture, but saw a significant transformation in the past two decades that included an expansion of the services sector. Services contribute over 59% of GDP, while industrial production and agriculture account for 26% and 14%, respectively.[4] The GDP of Ukraine stood at $90 billion in 2015, which represents a very sharp decline from $183 billion in 2013[5] owing to significant disruption of trade, production and capital markets resulting from the war in Donbass, loss of Crimea and severance of ties with the Russian economy. The country's GNI per capita has also declined, at $2640 in 2015.[6]

2. Access to Internet & Internet Services

2.1 Penetration

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[1] State Statistics Service of Ukraine http://www.ukrstat.gov.ua/operativ/operativ2016/ds/kn/kn_u/kn0916_u.html accessed on March 30, 2017

[2] The territory number is given for the period before the 2014 annexation of Crimea by the Russian Federation and armed conflict in the Donbass region, after which Ukraine lost control of those territories, while the population estimate takes such developments into account.

[3] State Statistics Service of Ukraine http://www.ukrstat.gov.ua/druk/publicat/kat_u/2016/zb/07/zb_rpnsv_16xl.zip

[4] CIA World Factbook, "Ukraine", https://www.cia.gov/library/publications/the-world-factbook/geos/up.html

[5] Country data for Ukraine, World Bank, available at: http://data.worldbank.org/country/ukraine accessed on March 30, 2017.

[6] Ibid.

Despite high levels of urbanization, Ukraine lags behind other countries of Eastern Europe in terms of penetration. As of 2015, International Telecommunications Union (ITU) lists the percentage of individuals aged 6+, using Internet in Ukraine to be just 48.8%.[7] Another estimate by Internet Livestats for 2016 gives an even lower figure of 44%[8], while Ukraine's State Statistics Service provides an even lower number of Internet users for January 2017, translating to a penetration rate of just over 39%.[9] According to market research firm Gemius, in mid-2016, 20.2 million Ukrainians access Internet at least once a month, which represents a penetration rate under 44%.[10]

According to the Statistics Service, as of January 2017 the country had 16.7 million subscribers with access to Internet. Of that group, 9.7 million were mobile broadband subscriptions and 5 million were fixed broadband subscriptions. The low penetration rate puts Ukraine behind most of its peers – in the State of Broadband 2016 report, the country ranks 77nd among 187 nations in the fixed broadband category, and 159th in the mobile broadband category.[11]

2.2 Demographics of the Internet audience and its uses of Internet

According to a survey by the Kiev International Institute of Sociology, as of February 2016, 62% of adult Ukrainians were users of Internet.[12] However, there are significant disparities correlated with age, gender, geography and income. Older respondents report low rate of usage (26% among the group 60 and older), while among the age group 18-39, 91% of respondents use Internet. Only 56.1% of women report using Internet, compared to 68.3% of male respondents.

Vast differences in access to Internet are also apparent among the regions of Ukraine. Among the surveyed households in Kiev, 78% have Internet subscription, while in the Kirovograd region only 31%. Several other regions have household penetration rates at 45% or lower. Urban-rural divide is exhibited as well – only 46% of rural households have access to Internet, compared to 77% for medium towns with population between 50,000 and 100,000. Respondents reporting financial difficulties show much lower rate of usage (30% to 58%), compared to the richer group (90.3%).

According to Gemius, 90.5% of the Ukrainian online audience gets online through a PC, while 30% of the same respondents rely on their mobiles or smartphones to access Internet. Google services, Youtube, the Russian social media network Vkontakte, and mail services Mail.ru and Yandex.ua are among the most popular online destinations for the Ukrainian audience.[13]

2.3 Barriers to access

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[7] International Telecommunications Union, "Percentage of individuals using Internet", https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx accessed on September 30, 2016.
[8] Internet LiveStats, Ukraine page http://www.internetlivestats.com/internet-users/ukraine/ accessed on March 30, 2016.
[9] State Statistics Service of Ukraine, "Communication Subscribers (annual data)", http://www.ukrstat.gov.ua/operativ/operativ2016/zv/az/az_e/az2016_e.htm accessed on March 30, 2016.
[10] Gemius, "Online audience and most popular sites in Ukraine in July" http://www.gemius.com.ua/novosti-agentstv/onlajn-auditorija-i-samye-populjarnye-sajty-v-ukraine-za-ijul.html
[11] ITU, "The State of Broadband 2016: Broadband Catalyzing Sustainable Development", http://www.itu.int/pub/S-POL-BROADBAND.17-2016
[12] http://kiis.com.ua/?lang=rus&cat=reports&id=621&page=1
[13] Gemius, "Online audience and most popular sites in Ukraine in July".

Ukraine has few substantial barriers to access. Cost of connectivity may of concern for certain low-income groups of population, as suggested by the Kiev International Institute of Sociology mentioned in the previous sub-section. However, the cheapest subscription for an unlimited fixed connection at speeds up to 10 mbit/s costs 2.5 USD.[14] In the Inclusive Internet Index 2017 by the Economist Intelligence Unit, Ukraine ranks 23rd among 75 countries under the affordability sub-ranking, which examines the cost of access relative to income and the level of competition among Internet providers.[15]

Ukraine also ranks high (26th out of 75 countries) under the availability sub-ranking of this index, which "examines the quality and breadth of available infrastructure required for access and levels of Internet usage." As elsewhere in the post-Soviet space, almost anyone wanting to connect to Internet is able to gain access, especially given the rise of mobile infrastructure. Only the very remote rural areas may experience difficulties connecting to Internet.

Overall, the older generation of Ukrainians stands out among the population groups with disadvantaged opportunity for access, due to skills gap and high cost of connectivity relative to income.

3. ICT Actors & Infrastructure

3.1 Fixed Communication
The Ukrainian fixed broadband market is highly fragmented, with only one leading company and over 20 small providers. The top three providers are Ukrtelecom, KievStar and Volia Kabel.

Ukrtelecom, a former state company and fixed telephony monopoly, is the dominant provider of Ukraine, with over 1.6 million subscribers.[16] Since 2013, the company is owned by SKM Group, a leading financial-industrial conglomerate in the country, belonging to oligarch Rinat Akhmetov. Ukrtelecom controls 100% of shares of the mobile operator TriMob.

Kyivstar, which also happens to be the leading mobile operator, has over 0.8 million subscribers, while Volia Kabel, a major cable TV provider, has over 0.6 million subscribers. Six other providers have subscriber bases ranging from 300 thousand to 112 thousand.

3.2 Mobile Connection
Kyivstar, MTS Ukraine/Vodafone and Lifecell are the top three operators, accounting for over 97% of the total subscriber base of 57.5 million (and penetration rate of 133%).[17] Kyivstar has approximately 43% market share, MTS follows with 35% and Lifecell has another 18%.[18] Other smaller operators include Intertelecom, Ukraininan Telesystems (brand PeopleNet), TriMob and MTS Ukraine (brand Yezzz!).

With less than 10 million mobile broadband users across all operators, Ukraine lags behind other countries in the Eastern European region. It was the last country in Europe to introduce 3G coverage,

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[14] UkrTelekom http://www.ukrtelecom.ua/services/customers/internet/fttb
[15] Economist Intelligence Unit, The Inclusive Internet: Mapping Progress 2017
https://theinclusiveinternet.eiu.com/explore/countries/performance?category=affordability
[16] http://protv.ua/news/telecommunications/obzor_shirokopolosnogo_interneta_v_ukraine/
[17] http://www.ukrstat.gov.ua/operativ/operativ2016/zv/az/az_u/az2016_u.htm
[18] https://www.telecompaper.com/news/ukrainian-mobile-subscriber-base-reaches-59-mln--1138766

with licenses issued only in early 2015.[19] As of 2017, only 40% of the country's territory is covered by the 3G service, and bidding for 4G spectrum is expected to be completed only by end of the year.[20]

Several operators provide access through the wireless Wimax technology – Ukrainian Newest Technologies (brand FreshTel), Intellectual Communications (brand Giraffe), UNTS, MMDS Ukraina and Vedekon. Kyiv and most regional cities are covered, with additional services including fixed broadband and TV plans.

Satellite Internet is a niche segment, offered by several providers, such as Data Group and TooWay, with symmetric access through Russian and European satellite companies.

3.3 **International Communication**
Owing to its geography, lax regulatory environment and strong local demand, Ukraine is well-connected to global Internet, with competitive market for international bandwidth filled by Ukrainian, Russian and European companies. Apart from providers specializing in trans-border capacity, most leading ISPs and mobile operators have their own international Internet connection ports, including Ukrtelecom and Kyivstar. These two companies have 16 and 9 international ports respectively.

Datagroup is a leading local player, with 37% market share in monetary terms,[21] while Russian-owned companies based in Ukraine, such as RETN, Data-IX, Fiord and Cloud-IX provide up to 50% of the total international traffic.[22] Links with Russia's infrastructure are highly important for the country, as content from the Russian-language segment of the Internet is highly popular among Ukrainians, reaching 60% of all international traffic.

Ukraine sees a growing importance of its infrastructure as a transit route from Europe to Asia, with such traffic exceeding 3.5 titb/s and more investment expected from existing players and newcomers.

4.   **Regulatory ICT Policy**

4.1 **Regulatory/governing bodies and standards (National & International)**

According to the law on telecommunications, state administration of the telecommunications is assigned to the **Cabinet of Ministers of Ukraine** and the Central Body of the Executive Branch on communications. As of now, there is no such central body in Ukraine. However, since 2011, formation and implementation of state policy on telecommunications is assigned to the **State Service of Ukraine for Special Communications and Protection**, which was part of the State Security Service until 2007.

The state regulatory body for the telecommunications sector is the **National Commission for Regulation of Communications and Informatization (NCRCI)**. This body is also responsible for regulation of the radio spectrum resource in Ukraine as well as for spectrum management, through the **Ukrainian State**

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[19] Kyivpost, "How Ukraine's 3G is changing telephone use" https://www.kyivpost.com/article/content/ukraines-it-edge/how-ukraines-3g-is-changing-telephone-use-400411.html

[20] https://economics.unian.net/transport/1534946-4g-svyaz-v-ukraine-nachinayutsya-boi-bez-pravil.html

[21] http://www.liga.net/projects/eastern_threat/

[22] http://biz.nv.ua/publications/opasnye-svjazi-ukraina-slishkom-pogrjazla-v-runete-100577.html

Center for Radio Spectrum. The latter also manages permits for importing of radio-electronic and radio-emitting devices into Ukraine.

Since 2014, Ukraine has a dedicated **Agency for Electronic Government of Ukraine**, implementing national ICT and e-government strategies. This agency coordinates the administration of domain names within the Ukrainian segment of Internet.

5. Information Security, Data Protection and Privacy

5.1 Internet Infrastructure (susceptibility to cybercrime, terrorism, and attacks)

Given the geography of Ukraine and its competitive telecommunications market, resulting in positive redundancies, the country is highly secure against disruptions of physical Internet infrastructure. However, considering its difficult relationship with Russia, marked by loss of Crimea and a military conflict in Donbass region since 2014, Ukraine has seen a rise of threats to its Internet infrastructure. There is an ongoing information war, a significant part of which is waged online, including state-sponsored cyberattacks alleged by both sides. Given the high dependence of Ukrainian companies and users on access to Russian content, and strong presence of Russian-owned ISPs in Ukraine, Ukrainian ISPs and activists have voiced concerns about susceptibility of Ukraine's access to Russian influence.

Ukrainian policy-makers have prioritized responses to such threats early on and created a national CIRT in May 2014 – government-oriented CERT-UA,[23] which emerged as a civic initiative and gained an official status under the State Special Communications Service.[24] In March 2016, Ukraine approved its national Cybersecurity Strategy, creating a National Coordination Center for Cybersecurity under the National Security and Defense Council of Ukraine.[25] The document focuses on protection and security of Ukraine's critical infrastructure, such as through creation of secure data centers and dedicated government telecommunications network and clearly references the cybersecurity risks associated with the Russian Federation.

In December 2016, the National Security and Defense Council of Ukraine passed the Doctrine for Information Security, a higher level strategic document with directives for strengthening the technical infrastructure of the country in support of information security objectives. [26]

Since January 2016, Ukraine has a second, privately owned CIRT center – CYS-Centrum.[27] Earlier in 2014, Ukraine ranked 17th (out of 29 ranks available) in the first Global Cybersecurity Index, behind its CIS neighbors Russia and Moldova.[28] Since then, Ukraine dealt with several shortcomings identified by the index, including the lack of "officially approved national or sector specific cybersecurity framework".

5.2 Types of attacks, actors, and those targeted

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[23] http://cert.gov.ua
[24] https://ain.ua/2014/05/21/v-ukraine-oficialno-poyavilis-kibervojska-poka-skoree-kiberotryad
[25] http://www.president.gov.ua/ru/news/prezident-zatverdiv-strategiyu-kiberbezpeki-ukrayini-36856
[26] https://digital.report/ukraina-prinyala-doktrinu-informatsionnoy-bezopasnosti/
[27] http://biz.liga.net/all/it/novosti/3232716-v-ukraine-poyavilsya-chastnyy-tsentr-reagirovaniya-na-kiberugrozy.htm
[28] ITU, Global CyberSecurity Index 2014 (April 2015), http://www.itu.int/dms_pub/itu-d/opb/str/D-STR-SECU-2015-PDF-E.pdf accessed October 4, 2016

In recent years, Ukraine is seeing a growing number of attacks on primarily government targets. In January 2016, a wave of cyberattacks occurred throughout Ukraine. The Ukrainian state railways company experienced disruptions of its ticketing and billing systems, while television companies 1+1 and STB, the Borispol airport of Kiev, and several government agencies reported similar attacks.

These attacks had similarities with incidents taking place earlier in December 2015, when energy distributing companies in Ukraine saw their networks and data infringed upon, ultimately leaving several thousand households without electricity for a brief period.[29] Later investigations of those attacks, including by the Kaspersky Lab, revealed compromises of computer networks dating back to May 2014, and use of similar source code for DDOS attacks against Georgia in 2008.[30]

A more recent round of attacks targeted Ukraine in late 2016. According to President Petro Poroshenko, in November and December 2016, Ukraine saw over 6500 instances of cyberattacks targeting five government agencies and 31 state information resources.[31]

Beyond government targets, regular citizens in Ukraine, which itself has traditionally been a country of origin for many cyber-threats of global significance, remain vulnerable to cybercrimes. In 2015, as part of the police reform initiative, the Ukrainian interior ministry raised the status of its cybercrimes unit, and recruited more cyber-police officers, seeking to address digital crimes through better technical expertise. According to Ukrainian cyber-police officials, in 2016 the number of registered crimes increased by 7%,[32] with more than 10 thousand crime reports filed and high frequency of online fraud, unauthorized access to bank accounts, fishing for private data and malicious software.[33]

Private sector entities are among the victims as well, especially those representing finance and telecommunications sectors. In August 2016, Kyivstar a leading mobile operator reported a wave of TDOS attacks, an analogue of DDOS attacks on mobile networks, resulting in massive deterioration of voice and data services.[34] No conclusive evidence about the origin of attacks was offered.

The future outlook in terms of country threats is not positive. According to sectoral security experts, more attacks are expected to take place in 2017, with increased risks for telecommunications providers, public infrastructure and private sector.[35]

5.3 **Government surveillance**

There is no established mass surveillance system for online communication in Ukraine. The existing law on telecommunications stipulates that telecom operators install equipment and technology facilitating investigations by law enforcement agencies and prevent publicizing of their knowledge on how such

[29] http://biz.liga.net/all/it/stati/3251987-rassledovanie-kiber-ataki-na-ukrainu-kak-virus-slomal-oblenergo.htm
[30] https://securelist.com/blog/research/73440/blackenergy-apt-attacks-in-ukraine-employ-spearphishing-with-word-documents/
[31] http://www.pravda.com.ua/rus/news/2016/12/29/7131254/
[32] https://digital.report/glava-kiberpolitsii-ukrainyi-kiberprestupnost-za-proshlyiy-god-vyirosla-na-7/
[33] http://www.dsnews.ua/future/kiberzlodei-ot-sbora-deneg-na-separov-do-putan-po-predoplate-31012017220000
[34] http://biz.liga.net/all/telekom/stati/3452624-kievstar-shtormit-khakery-nauchilis-otklyuchat-mobilnuyu-svyaz.htm
[35] http://www.epravda.com.ua/rus/columns/2016/12/20/615259/

investigations are conducted. However, this provision appears to be in effect only among the mobile operators and existing ISPs have no such equipment on their networks.

In January 2014, there was a legislative initiative, which attempted to introduce a more specific language, strengthening the responsibility of ISPs to install such equipment; it failed amid protests from telecom associations. In February 2016, president Poroshenko signed a decree instructing the government to issue new provisions, under which the telecommunications operators are expected to comply with law enforcement requests to store and submit data for periods from 90 days to 3 years.[36]

6: Legal Overview

6.1 Current Laws

The core legislation shaping the basis for Internet freedom in Ukraine includes several laws and strategic documents, many of which appear to be focused on security issues.

The above mentioned Doctrine for Information Security, adopted in December 2016 provides among other components a policy framework for security aspects of Internet connectivity and Internet infrastructure. The National Security Strategy approved in May 2015 also spells out several information security aspects, detailing the powers and responsibilities of relevant state institutions, and long term measures for improved security infrastructure, capacity for identifying, analyzing and responding to threats and synchronizing information security legislation with best practice, such as from EU and NATO member states. Finally, the national Cybersecurity Strategy, adopted in March 2016, specifically focuses on online security concerns, laying out the steps for enhanced security of online information resources and infrastructure as well as greater capacity for countering cyber espionage, military, terrorist and criminal cyber-threats. One particular provision of the strategy relates to supporting a competitive telecommunications market in Ukraine, with a goal of strengthening resiliency of the country's connectivity infrastructure.

The 2003 Law on Telecommunications, along with the 1995 Law on Communications represent core legal frameworks pertaining to telecommunications services, and supporting regulatory frameworks developed by the President, Cabinet of Ministers, the Ministry of Transportation and Communication and the national telecommunications regulator. Provision of Internet access is not a licensed activity in Ukraine, and there are no regulations for blocking of online resources, which is only possible through a judicial decision. Other relevant laws on media (with two separate laws on broadcast and print media) and information are also notable in that they contain no provisions for regulation of online media, as well as for blocking of online resources, while holding telecom providers responsible for protection of personal data of their consumers and ruling out the responsibility of providers for content transmitted through their networks.

In April 2015, the Cabinet of Ministers issued a plan to implement several 2002 European Commission directives regarding the telecommunications sector. The directives are focused on market competition, access and interconnectivity, and shared legal norms for provision of electronic communication networks and services. Universal services and user rights concerning such services and radio-spectrum management are also part of the implementation plan.

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[36] http://www.pravda.com.ua/rus/news/2017/02/18/7135750/

6.2 Litigation

With relatively favorable environment for Internet freedom, there are no recent cases of public interest litigation in Ukraine seeking to uphold such environment. However, the Ukrainian law enforcement bodies have been actively prosecuting citizens for "separatist" viewpoints, expressed online. In early 2016, a Chernigov resident was sentenced to five years in prison for online calls to revise the borders of Ukraine.[37] In February 2017, two residents of Donetsk region received similar sentences for separatist activity on the Russian social media network Vkontakte dating back to 2014-2015 period.[38]

6.3 Recent legislative initiatives

In March 2017, the Cabinet of Ministers mandated the Ministry of Justice, the Interior Ministry and the Security Service to develop a draft law to regulate the process of blocking online resources for purposes of countering and investigating online criminal and terrorist activity.[39] This move was informed by the February 2016 decree by president Petro Poroshenko, instructing the government to issue new provisions, under which the telecommunications operators are expected to comply with law enforcement requests to store and submit data for periods from 90 days to 3 years.[40]

Also in March 2017, the Ukrainian Rada passed a law on cinematography in Ukraine, containing provisions for blocking of web-resources with pirated content and liability of web resource owners for refusal to remove such content.[41] The law was passed after considerable public debate regarding the potential negative effect on Internet freedom, and adoption of amendments with input from the Internet Association of Ukraine.

In February 2017, an adviser to the Ministry of Interior Zoran Shkiryak called for banning in Ukraine of Russian social media networks Odnoklassniki and Vkontakte, which would help protect Ukraine from Russian propaganda.[42] A draft law supporting such measures is currently in development in the Ukrainian parliament, sponsored by Narodny Front party.[43]

6.4 Limitations and opportunities for advancing Internet freedom through legal means

Ukraine has a mixed outlook for activities advancing Internet freedom through legal means. The expected success of any such activity in Ukraine is highly dependent on political context and particular advocacy objectives. On the one hand, the country has strong civil society actors, independent media entities, active citizenry and vocal business sector. All branches of power and government maintain an open and collaborative stance in interacting with non-government partners on formulating and deliberating policy. This means that initiatives seeking to deploy legal means in pursuit of an improved

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[37] http://www.gp.gov.ua/ua/news.html?_m=publications&_c=view&_t=rec&id=170206
[38] http://don.gp.gov.ua/ua/news.html?_m=publications&_c=view&_t=rec&id=201458
[39] https://digital.report/mvd-sbu-i-ministerstvo-yustitsii-ukrainyi-podgotovyat-zakonoproekt-o-blokirovke/
[40] http://www.pravda.com.ua/rus/news/2017/02/18/7135750/
[41] http://itc.ua/news/vru-utverdila-zakon-o-gospodderzhke-kino-predusmatrivayushhiy-borbu-s-piratstvom-v-internete/
[42] https://digital.report/mvd-ukrainyi-neobhodimo-zablokirovat-rossiyskie-sotsseti/
[43] https://digital.report/v-ukraine-gotovitsya-paket-zakonoproektov-o-blokirovke-internet-resursov/

environment for Internet freedom can garner support from a variety of stakeholders and achieve their goals. On the other hand, if such initiatives are perceived as or interpreted as a potential security risk, connected in some way to weakening of Ukraine's position in the ongoing conflict with Russia, they will face significant barriers. In addition, as Ukraine still continues to work on its goal of implementing a genuine judicial reform, the judiciary is seen to be corrupt and not independent from the influence of other branches of power.[44]

7. Information Campaigns and Internet Activism

7.1 Advocacy work on IF
- o   Topics of activism, activist networks and campaign
- o   Mediums: social media, journalism, blogs, etc

Ukraine has a strong tradition of civic activism, which has taken especially deep roots after 2014, in the aftermath of Maidan protests and conflict with Russia. Major topics of civic activism include anti-corruption, elections monitoring, budget and procurement transparency, local community participation, free speech and European integration. Large networks of civil society organizations lead campaigns on such topics, as for instance the Reanimation Package of Reforms, Ukraine's largest coalition of NGOs facilitating reforms,[45] Civic Platform New Ukraine, an expert network focused on economic reforms,[46] Ukrainian National Platform of the Eastern Partnership,[47] with work on European integration and Civil Network Opora with activities concentrated on election and parliamentary monitoring.[48]

Professional and sectoral associations in Ukraine are well represented among civil society actors, informing and influencing government policies and voicing the positions of their members, such as the Internet Association of Ukraine with over 150 member organizations,[49] The Council for Competitiveness of the ICT Industry of Ukraine, and the National Union of Journalists of Ukraine, with over 20 000 members.[50] Standalone organizations pursuing a variety of public interest objectives have been successfully achieving change as well, including for instance the Anti-Corruption Action Center with track record of success in appealing corruption cases in courts and advocating for anti-corruption policy improvements,[51] and the Ukrainian Crisis Media Center, a non-profit, non-partisan media center facilitating global media coverage of Ukrainian affairs.[52] Many civic activists operate individually, successfully using social media platforms to gain a large following and influence public opinion.

Ukrainian activists make use of all traditional media channels, supplementing their outreach and in some cases building their core communication outlets through social media accounts, blogs, video platforms and other digital instruments. Online and email-based petitioning is in widespread use as an advocacy tool.

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[44] US State Department, Ukraine 2016 Human Rights Report, p. 12,
http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm?year=2016&dlid=265484
[45] http://rpr.org.ua/en/
[46] http://novakraina.org/vision-nova-kraina-english-version
[47]
[48] https://www.oporaua.org
[49] www.inau.ua
[50] www.nsju.org
[51] https://antac.org.ua/en/
[52] http://uacrisis.org/about

7.2 Government Response

The Ukrainian government officials generally maintain an open posture towards civil society and business advocates. Many current sectoral and national strategies include provisions for collaboration with civil society, while the existing legislation on access to information creates significant opportunities for deeper interaction with government institutions. In most cases of legislative and policy decision-making, the authorities make an effort to take into account the concerns of relevant stakeholders. The above-mentioned law on cinematography, where the Internet Association of Ukraine took a critical stance, represents an example of public policy decision amended to accommodate stakeholder concerns.

However, the attitude of officials appears to be not the same across all government institutions. One example concerning Internet freedom in particular and free speech issues in general is the position of the Ministry of Information Policy. Unlike their colleagues from security agencies, its representatives are against hard regulation of the online sphere and have called for balanced measures in addressing state information security priorities. In the recent period, there is also a tendency for increased antagonism between the officials and activists, as some of the advocacy work by civil society activists has seen significant backlash. For instance, in March 2017, President Poroshenko signed amendments under which anti-corruption activists, whose work is funded through foreign technical assistance, have to declare their personal assets the same as public officials.[53]

 Opportunities for additional/alternative advocacy

Among the advocacy priorities from the Internet freedom perspective, there is an immediate need to address the concerns related to strategic documents approved in the past two years within the information security realm. The ongoing work on operationalizing these high level documents through institutional bylaws and regulations has to be closely monitored and supported by input from professional associations, watchdog organizations and independent domain experts. The Doctrine on Information Security and its implementation process is a particularly important direction for additional advocacy. This may include an effort to clarify and institute the due process for blocking of online resources, with consideration of EU and other globally recognized best practice.

Amendments to the law on telecommunications are another area, where improvements are needed to include access to Internet to the list of universal access services, with identification of sources of funding. In late 2013, a draft law with amendments was initiated but the process stalled…

The governance of Ukraine's more than 50 public domains also requires attention, there is a need to introduce uniform procedures for registration. This can be achieved by passing of a Regulation on the .UA Domain Name, while more strategic objectives can be addressed by updating the existing Concept for .UA Domain Development, adopted more than 10 years ago.

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[53] http://www.atlanticcouncil.org/blogs/ukrainealert/the-coming-crackdown-on-ukraine-s-anticorruption-crusaders