



The Project is implemented  
by European Consultants Organisation (ECO)  
in consortium with THALES Services SAS,  
STELLA Consulting, ESTEP and EFICOM



The Project is funded  
by the European Union

## **Preliminary Assessment of Telecommunication Sector of Ukraine in compliance with the EU legislation and policies on information society**

The review deals with the Ukrainian legislation in the field of telecommunications and needs for its approximation to the legislation of the European Union. EU policies in telecommunication sector rests in general concept of Information Society. Telecommunications are just a technology and infrastructure on which information transfer and exchange has been based. Preliminary assessment gives some comparison between general trends in development instruments of Information Society in EU and legal proposition of Ukraine in specific telecommunication area. Ukraine –EU Action Plan defines priority areas in the line with Ukraine’s goal of further European Integration. Information Society, mainly acceleration of progress in e-communication policy and regulations is one of them.

### **1. European Background**

#### **1.1 Key Elements of the EU Policy on Telecommunications**

EU-led regulation had liberalised Europe’s telecommunications sector in the 1990s, creating growth and driving prices down.

The 2003 electronic communications framework updates the situation for a converging world. **It sees regulation as temporary, needed only until normal market conditions develop**, and is applied regardless of the technology, stimulating innovation. By creating a consistent market across Europe, it will give operators the confidence to build on a scale which only a market of 27 Member States and nearly 500 million consumers can provide, and will continue to increase consumer choice.

The new framework also means Europe can better coordinate the use of radio spectrum, stimulating growth in all sectors which use this resource, including wireless communications, satellite observations, digital TV and more.

For the development of technical implementing measures to ensure harmonised conditions for the availability and efficient use of radio spectrum, as well as the availability of information related to such use, the Commission may issue mandates to the CEPT<sup>1</sup> to which all Member States delegate radio spectrum experts.

The European Union's policy for the information society rests on the following main policy components:

---

<sup>1</sup> European Conference of Postal and Telecommunication Administration [www.cept.org](http://www.cept.org)

- the telecommunications policy, whose legal basis is to be found in Article 95 (Internal Market harmonisation), articles 81 and 82 (competition) as well as articles 47 and 55 (right of establishment and services) of the TEC;
- the support to technological development in information and communication technologies (ICT), which is based on articles 163 through 172 (research and development) of the TEC;
- the contribution to creating the necessary conditions for the competitiveness of the Community's industry, in line with article 157 of the TEC;
- regulations, directives, decisions, recommendations and communications of EU Commission and European Parliament.
- the promotion of trans-European networks (TEN) in the transport, energy and telecommunications sectors, as stipulated in Articles 154, 155 and 156 of the TEC.

### ***The i2010 strategy and the eEurope action plans***

The eEurope initiative has been instrumental in giving the information society new momentum. The aim is to bring the benefits of the information society within the reach of all the Union's citizens and all European businesses, in particular small and medium-sized enterprises (SMEs). media.

**i2010** is built around three priorities:

- the completion of a Single European Information Space which promotes an open and competitive internal market for information society and media;
- stepping up innovation and investment in ICT research;
- achieving an inclusive European Information Society that prioritises better public services and quality of life.

### ***Telecommunications regulatory framework***

Developments in the telecommunications sector constitute an essential element in the progress towards the information society. The EU telecommunications policy has been oriented from the beginning towards the completion of the Internal Market and the liberalisation of the provision of services and infrastructure. On 1 January 1998, the full liberalisation of Europe's telecommunications market became a reality.

The European regulatory framework was rounded off by a Directive of 2002 on competition in the markets for electronic communications networks and services<sup>2</sup>.

### ***Common technical standards in mobile communications***

The EU telecommunications policy is at the centre of the EU information society strategy, as it remains the key driver of the fast and broad dissemination and take-up of new information society services. In the context of e-Europe, this particularly concerns cheaper and faster Internet, which is a prerequisite for wider adoption of the Internet by people and businesses, in particular SMEs.

### ***Protection of personal data and privacy***

New technologies, and in particular the Internet and electronic messaging services, call for specific requirements to ensure that users have a right to privacy. The EU has adopted a very favourable

<sup>2</sup> Commission Directive 2002/77/EC of 16 September 2002 on competition in the markets for electronic communications networks and services (OJ L 249 of 17.09.2002).

legal framework in this respect: a Directive ensuring the legal and mutual recognition of electronic signatures<sup>3</sup>, a Regulation liberalising intra-Community trade in encryption products (confidentiality) a Directive protecting personal data<sup>4</sup>, and a Directive on data protection in the electronic communications sector which was adopted in July 2002<sup>5</sup>.

### *Network security*

The EU has stepped in to ensure network security by taking measures to tackle cybercrime<sup>6</sup> and penalise attacks against information systems<sup>7</sup>.

To ensure that users enjoy the highest levels of security, the EU has decided to set up a European Network and Information Security Agency (**ENISA**)<sup>8</sup> which acts as an advisory and coordinating body for measures taken by the Member States to secure their networks and information systems. The aim is to increase the ability of the Union, Member States and companies in the sector to react to and manage security and information-related problems. The agency has been in operation since March 2004.

## ***1.2 Relevant EU Horizontal Policies***

Besides specific programmes of action in individual sectors, the **European Union's activities are steered by more generic policy goals**. Such objectives often provide the legal basis for EU action in various areas, while **EU regulation**, including for telecommunications, **ought to be developed in line with the key principles of such policies**.

### *The Single Market*

The general mission of the European Community defined in Article 2 of the EC Treaty, establishes the creation of an internal market as a means "to promote throughout the Community a harmonious, balanced and sustainable development of economic activities, a high level of employment and of social protection, (...) a high degree of competitiveness and convergence of economic performance, a high level of protection and improvement of the quality of the environment, the raising of the standard of living and quality of life, and economic and social cohesion and solidarity among Member States".

---

<sup>3</sup> Directive 1999/93/EC of the European Parliament and of the Council of 13 December 1999 on a Community framework for electronic signatures (OJ L 13 of 19.01.2000).

<sup>4</sup> Directive 95/46/EC of the European Parliament and Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (OJ L 281 of 23.11.1995).

<sup>5</sup> Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (OJ L 201 of 31.07.2002).

<sup>6</sup> Communication COM(2000) 890 final from the European Commission to the Council, the European Parliament, the Economic and Social Committee and the Committee of Regions of 26 January 2001 (not published in OJ).

<sup>7</sup> Council Framework Decision 2005/222/JHA of 24 February 2005 on attacks against information systems (OJ L 69 of 16.3.2005).

<sup>8</sup> Regulation (EC) No 460/2004 of the European Parliament and of the Council of 10 March 2004 establishing the European Network and Information Security Agency (OJ L 77, 13.03.2004)

## *Competition*

The promotion of pan-European competition in the EC is a core competence of the European Union and also emanates from Article 2 of the EC Treaty. Article 4 of Commission Directive 2002/77/EC of 16 September 2002 on competition in the markets for electronic communications networks and services<sup>9</sup> **prohibits the granting by Member States of exclusive or special rights to use radio frequencies for the provision of electronic communications services** and requires that the assignment of radio frequencies for electronic communications services be based on objective, transparent, non-discriminatory and proportionate criteria.

## *Trade*

Allocation and use of radio spectrum are subject to the legal implications of the commitments taken by the EC and its Member States in the World Trade Organisation framework regarding communications services. WTO rules contain relatively general rules relating to spectrum policy. **These obligations and requirements forbid any national or regional spectrum allocation or assignment measure which has the purpose or the effect of blocking, or unreasonably limiting, market access for operators from other WTO Member countries.** Discriminatory, anti-competitive or arbitrary frequency allocation decisions are forbidden by GATS. However, within such limits, GATS recognises that frequency management policies do not per se constitute a market access barrier.

### **1.3 International Dimension of Telecommunication Standards**

The Internet and e-commerce are global by nature. This means that minimum common rules should be developed at international level. To achieve that, the Commission is involved in the work of several multilateral organisations such as the International Communication Union (**ITU**), the World Trade Organisation (**WTO**), the World Intellectual Property Organisation (**WIPO**), and the Organisation of Economic Cooperation and Development (**OECD**). One of the main achievements at global level is the WTO General Agreement on Trade in Services (**GATS**) in telecommunications, which opens up to competition a significant share of the global telecommunications services market. The Commission also supports the Global Business Dialogue on e-commerce (**GBDe**), which brings together representatives of the global business community. The aim is to provide global self-regulatory solutions and to assist governments in setting rules for e-commerce.

### **1.4 The EU Regulatory Framework for Electronic Communications**

The main document concerning EU telecommunication dimension is the Directive [2002/21/EC](#) of the European Parliament and of the Council of 7 March 2002 on a common regulatory framework for electronic communications networks and services ("**Framework Directive**")<sup>10</sup>. The objective of this Directive is to establish a harmonised framework for the regulation of electronic communications networks and services.

The "Framework Directive" forms part of the "**Telecommunications Package**" designed to recast the regulatory framework for telecommunications in order to make the electronic communications

---

<sup>9</sup> OJ L 249 of 17.09.2002

<sup>10</sup> OJ L 108 of 24.04.2002

sector more competitive. This regulatory framework consists of this Directive plus four specific Directives, namely the:

- Directive on the authorisation of electronic communications networks and services (the “[Authorisation Directive](#)”)<sup>11</sup>;
- Directive on access to, and interconnection of, electronic communications networks and associated facilities (the “[Access Directive](#)”)<sup>12</sup>;
- Directive on the universal service (the “[Universal Service Directive](#)”)<sup>13</sup>;
- Directive concerning the processing of personal data (the “[Directive on Privacy and Electronic Communications](#)”)<sup>14</sup>.

Added to this list, there is also the Decision on a regulatory framework for radio spectrum policy (the “[Radio Spectrum Decision](#)”)<sup>15</sup>.

The “Framework Directive” establishes the institutional framework in EU MSs represented by **national regulatory authorities**, which should face such criteria:

- **Independence.** Member States must guarantee the independence of national regulatory authorities by ensuring that they are legally distinct from and functionally independent of all organisations providing electronic communications networks, equipment or services.
- **Right of appeal.** At national level effective mechanisms must allow any user or undertaking providing electronic communications networks or services the right of appeal to an independent appeal body in the event of any disputes with a national regulatory authority.
- **Impartiality and transparency.** Member States must ensure that national regulatory authorities exercise their powers impartially and transparently. They must also ensure that the national regulatory authorities make arrangements for consultation of the interested parties if they intend to take measures which could have a significant impact on the market.

General tasks of national regulatory authorities in order to promote competition in the provision of electronic communications networks and services, are:

- ensuring that users derive maximum benefit in terms of choice, price and quality;
- encouraging investment in infrastructure and promoting innovation;
- encouraging efficient use and management of radio frequencies and numbering resources.

The national regulatory authorities must also contribute to development of the internal market by, *inter alia*:

---

<sup>11</sup> Directive 2002/20/EC of the European Parliament and of the Council of 7 March 2002 on the authorisation of electronic communications networks and services (OJ L 108 of 24.04.2002).

<sup>12</sup> Directive 2002/19/EC of the European Parliament and of the Council of 7 March 2002 on access to, and interconnection of, electronic communications networks and associated facilities (OJ L 108 of 24.04.2002).

<sup>13</sup> Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (OJ L 108 of 24.04.2002).

<sup>14</sup> Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (OJ L 201 of 31.07.2002).

<sup>15</sup> Decision No 676/2002/EC of the European Parliament and of the Council of 7 March 2002 on a regulatory framework for radio spectrum policy in the European Community (OJ L 108 of 24.04.2002).

- encouraging the establishment and development of trans-European networks and the interoperability of pan-European services;
- ensuring that there is no discrimination in the treatment of undertakings providing electronic communications networks and services;
- cooperating with each other and with the European Commission to ensure the development of consistent regulatory practice and consistent application of the new regulatory framework for the telecommunications sector.

The final task of the national regulatory authorities is to promote the interests of the citizens of Europe by, *inter alia*:

- ensuring that all citizens have access to a universal service, as specified in Directive 2002/22/EC (“[Universal Service Directive](#)”)<sup>16</sup>;
- ensuring the availability of simple and inexpensive dispute resolution procedures;
- contributing to ensuring a high level of protection of personal data and privacy (see also “Directive on [Privacy and Electronic Communications](#)”)<sup>17</sup>.

National Regulatory Agencies should cover following areas of telecommunication businesses:

- a. Management of radio frequencies
- b. Numbering, naming and addressing
- c. Rights of way
- d. Co-location and facility sharing

Directive 2002/77/EC on competition in the markets for electronic communication networks and services<sup>18</sup> established **regulatory control on undertakings with significant market powers**. An undertaking is considered to have significant market power if it is in a position to behave independently of competitors, customers and, ultimately, consumers.

The key provision of the directive provides for the **abolition of exclusive or special rights granted by the Member States** for the establishment and/or the provision of electronic communications networks, or for the provision of publicly available electronic communications services. Before 24 July 2003, each Member State was obliged to take the necessary measures to guarantee each undertaking the right to provide services or exploit networks, without discrimination, in accordance with a general authorisation regime which replaces the licensing system.

Only a reasoned opinion on the part of the competent regulatory authority within the framework of a general request for authorisation may prevent an undertaking from providing services or networks.

**Member States must ensure that vertically integrated public undertakings** which provide electronic communications networks and which are in a dominant position **do not discriminate in favour of their own activities**.

The trend to liberalisation also extends to directory and directory enquiry services, frequencies, television satellites and cable networks with the same objective of abolishing any unjustified restriction which might hinder the development of competing services.

---

<sup>16</sup> OJ L 108 of 24.4.2002

<sup>17</sup> OJ L 201 of 31.07.2002

<sup>18</sup> OJ L 249 of 17.09.2002

## 2. National legal framework and methodology in force

### 2.1 Panorama of the national legislation

The framework of the telecommunication legislation in Ukraine is based primarily on the several laws:

- Law of Ukraine of 18 November 2003 No 1280-IV “On Telecommunications” (last modification – 28 November 2006);
- Law of Ukraine of 01 June 2000 No 1770-III “On Radio Frequency Resource of Ukraine” (in the wording of 19 December 2006);
- Law of Ukraine of “On e-documents and e-documents circulation” of 22 May 2003 No 851-IV (last modification – 31 May 2005);
- Law of Ukraine of “On electronic digital signature” of 22 May 2003 No 852-IV;
- Law of Ukraine “On Conformity Assessment” of 17 May 2001 No 2406-III (last modification - 01 December 2005);
- Law of Ukraine “On Standardisation” of 17 May 2001 No 2408-III (last modification - 01 December 2005).

It is expected that in the nearest future some amendments concerning mostly definitions and national roaming will be inserted to the Law “On Telecommunications” (draft Law of 06 September 2006 registered under No 2047).

The primary legislation established liberalised regime for all activities in this sector, except those concerning data protection, activities of state authorities and extraordinary situations.

Regarding basic laws the procedure of licensing is transparent and non-discriminatory. The overall term for procedural examination of the licence request on telecommunication activities is limited to 30 days (under Article 46 (1) of the Law “On Telecommunications”). Additionally, the Concept of Telecommunications Development in Ukraine to 2010 foresees that licensing in telecommunications sector shall be in line with EU regulatory policy in telecommunications sphere, particularly with provisions of the Directive 2002/20/EC of the European Parliament and the Council (the “**Authorisation Directive**”) <sup>19</sup> concerning simplification of authorisation procedure.

The Law “On Telecommunications” also establishes the main principles of interconnections of telecommunications and commits National Communications Regulating Commission to approve and, at least once per year, to publish in the official journal the catalogue of offers of telecommunications operators as to interconnecting with their telecommunications networks. Published offers shall incorporate the list of existing interconnection points in telecommunications networks, organisational, economic and technical conditions of interconnection.

The subsequent secondary legislation covers mainly institutional, licensing and technical issues. It consists of the following:

- Decree of the President of Ukraine of 21 August 2004 No 943/2004 “On National Communications Regulating Commission of Ukraine”.
- Decree of the President of Ukraine of 19 April 2005 No 664/2005 “On the composition of the National Communications Regulating Commission of Ukraine”.

---

<sup>19</sup> OJ L 108 of 24.4.2002

- Decree of the President of Ukraine of 22 May 1998 No 505/98 “On the Regulations of the execution of cryptographical security of information in Ukraine”.
- Regulation of the Cabinet of Ministers of Ukraine of 22 February 2006 No. 200 “On Payment Amounts for Issuance, Extension of Term, Re-execution, Issuance of Duplicate Licences for Usage of Radio Frequency Resource of Ukraine”.
- Order of the State Committee on Communications and Informatisation of Ukraine of 17 June 2004 No. 132 “On approval of Licensing Provisions for business in the telecommunication domain aimed at rendering fixed international, longdistance or local telephone communication services with the right of maintenance and operation of telecommunication networks and letting electrical communication channels for usage”, registered with the Ministry of Justice of Ukraine on 5 August 2004 under No. 977/9576 (in pursuance of Article 44 of the Law of Ukraine “On Telecommunications”).
- Resolution of the National Communications Regulating Commission of 17 May 2005 No. 1 “On Regulations of the National Communications Regulating Commission of Ukraine”.
- Resolution of the National Communications Regulating Commission of 12 August 2005 No. 46 “On approval of Regulations of drawing Conclusions as to electromagnetic compatibility and Permits for operation of radio electronic facilities”, registered with the Ministry of Justice of Ukraine on 31 August 2005 under No. 963/11243.
- Resolution of the National Communications Regulating Commission of 19 August 2005 No. 53 “On approval of license conditions of using Ukrainian radio frequency resources”, registered with the Ministry of Justice of Ukraine on 20 October 2005 No. 1237/11517.
- Resolution of the National Communications Regulating Commission of 7 October 2005 No. 91, registered with the Ministry of Justice of Ukraine on 11 November 2005 under No. 1366/11646 “Procedures of interconnection and mutual settlements of operators engaging in the activities related to rendering fixed international, longdistance telephone communication services using IP telephony technologies”.

Special attention should be drawn to the Concept of Telecommunications Development in Ukraine 2010, approved by the Ordinance of the Cabinet of Ministers of Ukraine of 7 June 2006 No 316-p., which is stressing the necessity of achieving by Ukraine the European level of telecommunications and need of harmonization of national telecommunication standards with the international and European standards. Also this instrument emphasised on the meeting of the WTO requirements in the sphere of telecommunication services market.

## 2.2 International framework

Ukraine is the member of the International Telecommunication Union, the International Organization for Standardisation and the European Conference of Postal and Telecommunications Administrations access main Conventions in the field of telecommunications (e.g. of International Telecommunication Union), as well as EU MSs. So the basic principles of Ukrainian legislation in the field of telecommunications are the same as in the EU MSs.

The basis of EU-Ukraine relations in the field of telecommunications are established by the **Article 66 “Postal services and telecommunications”** and **74 “Information and communication”** of the PCA and by the Memorandum of Understanding between Directorate General on Information society of the European Commission and State Committee on Communications of Ukraine on Development of Information Society”.

It needs to be stressed that Article 51 of PCA concerning legal approximation has **no direct reference to approximation of national telecommunication legislation** to that of the EU. Of

course there are horizontal connections with such key spheres as intellectual property, consumer protection, technical rules and standards etc.

Furthermore, the development of the modern world technology market makes telecommunications and information transfer developing in extremely prompt manner, so the legislators can not keep this pace or even to foresee the mid-term progress. Thus, it could be expected, that the legislation on telecommunications in EU and Ukraine will gradually be changing.

## 2.3 Institutional framework

Execution of state policy in the field of telecommunications is performed by the Cabinet of Ministers of Ukraine, central executive state body in charge of communications (for the time being – the **Ministry of Transport and Communications of Ukraine and State Department on Communication and Informatisation of Ukraine**) and other authorities in accordance with the Law “On Telecommunications”.

**Regarding the Article 17 of the Law “On Telecommunications” central executive authority in charge for regulation of telecommunications is the National Communications Regulating Commission (NCRC) which is having a special status and is controlled by the President of Ukraine. NCRC acts based on the Provision on the National Communications Regulating Commission formulated in accordance with the law and approved by the President of Ukraine.**

This authority acts as natural monopoly within the frames of the Law of Ukraine of 20.04.2000 No 1682-III “On natural monopolies” and corresponds the activities of the national regulatory authorise in EU MSs.

The cryptographical security of information is provided by the **State Service of Special Communication and Information Protection of Ukraine**.

**The leading Ukrainian telecommunications company – Ukrtelecom, which deals with more than 71% of the local telephone services market and 83% of intercity and international telephone services market<sup>20</sup>, is still owned by the Ministry of Transport and Communications. However, there are plans to transfer ownership rights by privatisation. At the same time, the mobile sector with increasing number of operators has continued to expand and the quality of service has improved.**

### 2.4. Brief on Ukraine’s telecommunication market in 2006

The increasing of mobile networks is obvious. For the first half of 2006 the overall number of mobile subscribers arose to more than 35 mln persons. The consuming of telecommunication services per capita increased more than 24% in comparison with the first half 2005.<sup>21</sup>

Also became evident the increasing of extent and quality of national modern services, such as web-trade, electronic transfers, i-points services etc.

Prima facie competition is developing on the market in all its sectors. For the last years several decisions were made by Antimonopoly Committee concerning tariffs of the biggest mobile operators in Ukraine within the frames of consumer protection policy.

---

<sup>20</sup> <http://www.ukrtelecom.ua/about/today>

<sup>21</sup> [http://www.mintrans.gov.ua/mintrans/control/uk/publish/article?art\\_id=57134&cat\\_id=45481](http://www.mintrans.gov.ua/mintrans/control/uk/publish/article?art_id=57134&cat_id=45481)

In 2006 was introduced the first part of technological centre of the Central Authenticate Body creating the possibilities for the legitimate providing of state e-services, e-documentation circulation in the state bodies, between the commercial organisations, banks and clients, as well as of e-commerce.

The priorities set up for Ministry of Transport and Communication in 2006 also included the development of wireless networks (Wi-Fi and Wi-max technologies), drafting of the National Strategy on Establishing of Information Society and the Concept of State Target Programme on Implementing of Digital Television and Radio.

### **3. Assessment of needs for approximation or harmonization of technical norms, standards and procedures**

As above-mentioned Ukraine has no direct obligation for approximation of its legislation to the EU legislation in the sphere of telecommunications. Nevertheless the nature of EU-Ukraine relations and mutual benefit would be the strong points of these activities and on integration of Ukraine's telecommunications to the EU telecommunications system.

The basic principles of the regulation of Telecommunication sector in Ukraine and EU are based on the international standards (e.g. International Telecommunication Union, European Telecommunications Standards Institute, European Conference of Postal and Telecommunications Administrations), a conclusion might be drawn. Thus Ukrainian basic legislation in this field is approximated in general with those in EU Member States.

While preparations for WTO accession, audiovisual policy of Ukraine and the regulation of telecommunication services market was fine tuned to the WTO requirements, which are in accordance with EU regulations.

The main needs for approximation belong to the sphere of standardisation and are the following:

- harmonisation of the **numeration of telecommunication networks**;
- harmonization of the **radio frequency scales** with the view of requirements of International Telecommunication Union and European Conference of Postal and Telecommunications Administrations;
- adoption of legislation on **technical and cryptographical safety** of information;
- development of legislation on **establishment of information society**;
- gradual harmonization of **copyright legislation** in Telecommunication Sector

Conformity assessment of telecommunications technical means shall be carrying out according to the technical regulations in telecommunications sector that are drafted according to the Law of Ukraine "On Conformity Assessment", taking into account EU requirements.

As abovementioned the legislation on telecommunications in EU and Ukraine is expected to be gradually changing. So there is a crucial need of mechanisms and methodology on the gradual approximation, especially in the terms of regulations and technical standards. The working out of such a methodology could be the next task of the UEPLAC's activities in this field.

#### 4. General Conclusions

By the UEPLAC's view, if new Enhanced Agreement between the EU and Ukraine is adopted, it should include the provision on approximation of Ukrainian legislation on telecommunications to the legislation of the EU.

UEPLAC expresses its readiness to continue its actions on detailed assessment of this sphere in accordance with ToR of the Project.

The following assessment of Telecommunication Sector should include the implementation matters.

**Juris Ozolins** UEPLAC Key Expert [juris.ozolins@ueplac.kiev.us](mailto:juris.ozolins@ueplac.kiev.us)

**Igor Gutsulyak** UEPLAC Legal Assistant [igor.gutsulyak@ueplac.kiev.ua](mailto:igor.gutsulyak@ueplac.kiev.ua)

Phone 380 44 2781268