

No. 43 / 16.03.2026

To: RIPE Network Coordination Centre
Stationsplein 11, 1012 AB Amsterdam, The Netherlands

Attn: Mr. Hans Petter Holen, CEO RIPE NCC
RIPE NCC Executive Board
RIPE NCC Members

Ref: *Concerns regarding the proposed pricing scheme and fee increases for PI resources*

Dear partners,

The National Association of Internet Service Providers of Romania (ANISP) and the National Network Interconnection Centre of Romania (RoNIX), operated by ANISP, wish to express their concerns regarding the proposals currently under consultation, which would significantly modify the RIPE NCC pricing scheme.

The second phase of the consultation provides for the increase of the annual fee for provider-independent (PI) resources from EUR 75 to EUR 1,000. While we recognize the need for long-term financial sustainability and appreciate the transparency of the process, a thirteen-fold increase in this specific fee would have unintended and disproportionate consequences for small members and non-LIR organizations in Romania. IP resources are widely used by regional Internet service providers, data centers, public institutions, educational networks, and critical infrastructure operators to maintain routing independence and multi-homing capabilities. These features are essential for maintaining connectivity in the event of supply disruptions and for promoting competition.

In addition to the IP fee, we are concerned about the models currently being developed for calculating the annual membership fee. According to the proposed models, based on categories and formulas (Model A and Model B), the annual fee starts from a base of EUR 500 and increases depending on the amount of IPv4/IPv6 resources owned, up to a ceiling of EUR 10,000. This structure means that large members effectively reach the cap and will not see significant growth, while small and medium-sized members with modest resource holdings could face much higher fees than under the current fixed model. In our view, this shifts the financial burden onto smaller operators and contradicts the principle of fairness articulated by the Tariff Scheme Task Force.

The Romanian internet ecosystem is characterized by numerous local actors and a decentralized structure. Many organizations hold IP resources without being LIRs. A sudden increase in IP fees and higher annual fees would have a direct impact on small

businesses, public authorities and non-profit institutions with limited budgets. For many of these users, the current fees already represent a significant expense; their dramatic increase risks creating financial barriers, pushing traffic towards a more concentrated market and diminishing the diversity of interconnections.

Phase 2 of the consultation also proposes separate additional fees on top of the annual contribution, including registration fees for new members, additional LIR account fees and transfer fees. While the consultation notes that all figures are illustrative and not final, we believe that the economic impact and risks should be thoroughly analysed for members in regions with different market structures before any proposal is finalised.

We believe that a sustainable and fair pricing model can be achieved without disproportionately affecting smaller members. The draft annual fee models could be complemented by mechanisms that cap or reduce fees for small members, non-profit organizations, educational institutions, and members in low-income countries, as suggested in the consultation's reduction options. Similarly, any increase in the IP assignment fee should be gradual and proportionate to the size and income of an organization.

In view of the above, we respectfully request the Executive Board to reconsider the inclusion of the proposed increase in the PI fee to EUR 1,000 and the current form of the new annual fee models on the agenda of the General Assembly in May 2026. We urge RIPE NCC to continue to engage with the community and conduct impact studies and alternative scenarios that would produce a balanced pricing scheme for all profiles of members. In the <charging schemes> to be proposed for voting in the General Assembly please also include the option to continue using the existing scheme.

We also encourage the exploration of alternative measures to protect the financial sustainability of RIPE NCC, such as optimizing internal costs (see other RIRs' models – for example charging extra service fees only to participants willing to consume such services), diversifying revenue streams and gradually adjusting contributions, instead of relying on steep increases that disproportionately affect small and medium-sized members.

ANISP and RoNIX reiterate their willingness to contribute constructively to the discussion on the future pricing scheme. We aim to find solutions that ensure the financial stability of RIPE NCC, preserve the resilience and decentralized nature of the Internet, and protect the interests of small members and institutions dependent on IP resources.

Sincerely,

The National Association of Internet Service Providers in Romania (ANISP) and RoNIX
(Romanian National Internet Exchange)