

THE STATE OF THE INTERNET AND DIGITAL RIGHTS IN KYRGYZSTAN (2019-2025)

This report is a comprehensive analysis of the state of the Internet and digital rights in Kyrgyzstan from 2019 to 2025. We begin with the basics: geography, population and economy, and then dive deep into the world of the Kyrgyz Internet. You will learn how many people use fixed and mobile Internet, what the speeds are like, who the main providers are and how local networks are generally structured.

Next, we discuss the rules and laws that govern the Internet in the country. This section explains which agencies are responsible for regulation and which laws affect online life. We examine how these rules, on the one hand, help develop technologies and, on the other hand, impose various restrictions on users.

The third part of the report is dedicated to the most important issue — freedom on the Internet. It covers censorship, website blocking and the prosecution of people for their posts and comments. We also describe how the state uses technologies for surveillance, such as facial recognition systems. All of this is supported by recent examples and statistics that show the real picture of digital freedoms in Kyrgyzstan.

This report was generated using several large language models (LLM). The information presented in it is based on the analysis and synthesis of data from the listed sources; however, the process of structuring, summarizing and presenting it was carried out using AI technologies.

We recommend using the report as a starting point for further research and critically verifying critical data against primary sources.

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1. GENERAL INFORMATION

1.1. GEOGRAPHICAL LOCATION

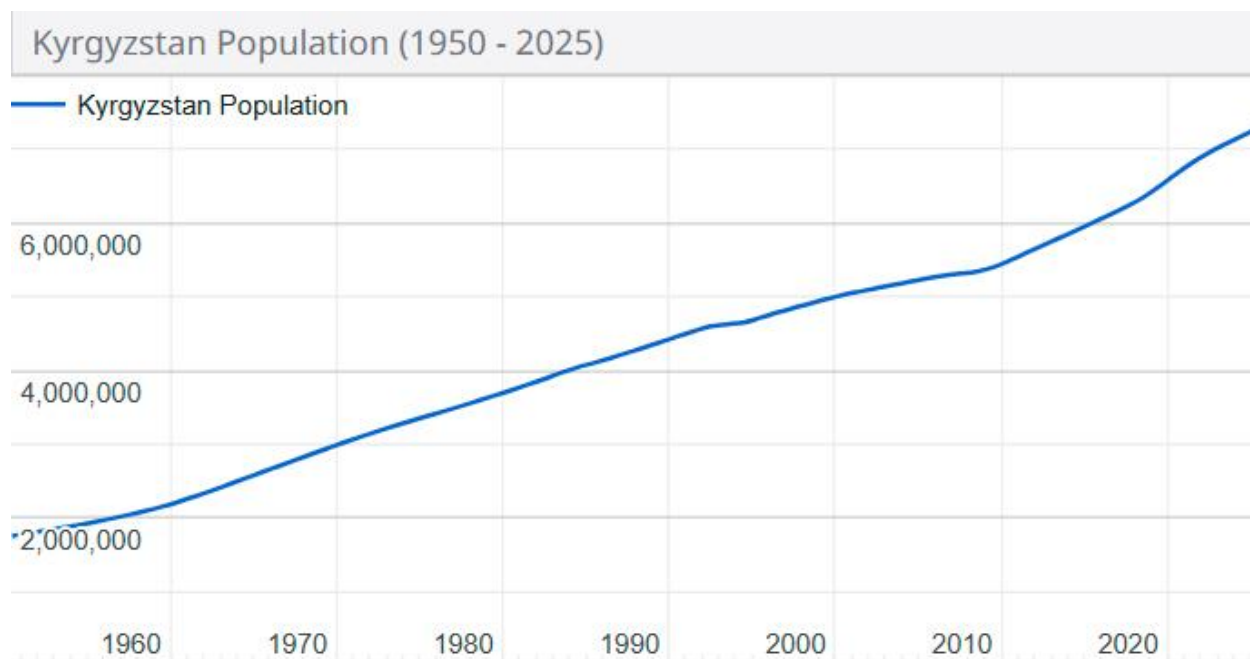
Kyrgyzstan, officially the Kyrgyz Republic, is a landlocked country located in Central Asia.¹ The country borders Kazakhstan to the north and northwest, China to the east and southeast, Tajikistan to the southwest and Uzbekistan to the west.¹ A significant part of the country's borders runs along mountain ranges.¹ The territory of Kyrgyzstan is predominantly mountainous, with more than 80% of the area occupied by the Tien Shan mountain system.¹ The main lowlands, where the majority of the population lives, include the Chui and Talas valleys in the north, as well as parts of the Fergana Valley in the southwest.¹ This mountainous geography creates certain challenges for infrastructure development, including telecommunications networks, which potentially leads to uneven Internet access between urban centres in the valleys and high-mountain rural areas.¹

1.2. POPULATION

According to official data from the National Statistical Committee of the Kyrgyz Republic (NSC KR), at the beginning of 2023 the population of the country was 7 million 37 thousand people.⁶ According to estimates by international organisations, the country ranks approximately 107th in the world by population.⁷ Population density is relatively low – about 38 people per square kilometre.⁷

A characteristic feature is the predominance of rural population, which accounts for about 60-66% of the total number of residents⁶, which distinguishes Kyrgyzstan from many more urbanised countries. The median age of the population is quite young – approximately 25.4 years⁷, which indicates a significant share of youth in the demographic structure. The ethnic composition of the population is predominantly Kyrgyz (more than 73-77%), followed by significant groups of Uzbeks (about 14-15%) and Russians (about 4-5%), as well as Dungans, Uyghurs, Tajiks and other nationalities.⁶

A steady population growth trend has been observed in Kyrgyzstan from 2019 to 2025, which is confirmed by both official NSC KR data and estimates from international sources. Steady population growth, especially combined with a young demographic structure, creates growing demand for Internet access, digital services and education. If infrastructure development and service affordability lag behind, especially in rural areas where the majority of the population lives, this may exacerbate the existing digital divide and limit opportunities for the younger generation.⁶

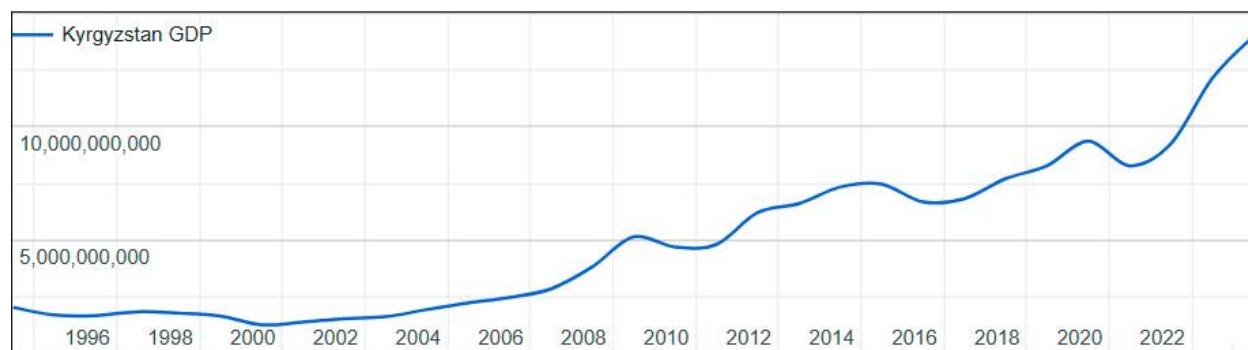
Chart 1: Population Dynamics of Kyrgyzstan (1950–2025)

Source: *worldometers.info*

1.3. GROSS DOMESTIC PRODUCT (GDP)

The economy of Kyrgyzstan is classified as a lower-middle-income economy.²⁰ After a decline in 2020 related to the COVID-19 pandemic, the country demonstrated steady nominal GDP growth in subsequent years.²¹ GDP per capita also increased significantly, although it remains below global averages.²³ The economy is heavily dependent on remittances from labour migrants (mainly from Russia) and trade, including significant volumes of re-export of goods from China to neighbouring countries.²¹

GDP dynamics from 2019 to 2024 reflect both external shocks and periods of recovery. Although nominal GDP shows significant growth after 2020, the structure of the economy, which relies on remittances and re-export, indicates its vulnerability to external economic fluctuations, such as changes in the Russian economy or the geopolitical situation.²¹ Such an economic structure may limit opportunities for long-term domestic investment in capital-intensive projects, such as the development of nationwide digital infrastructure.

Chart 2: Nominal GDP Dynamics of Kyrgyzstan (1993–2023)**Kyrgyzstan GDP (Nominal, \$USD) 1993-2023**

Source: *worldometers.info*

1.4. MAIN ECONOMIC CHARACTERISTICS

The economy of Kyrgyzstan experienced a sharp decline in 2020 (GDP contracted by 8.4%–8.6%), caused by the global COVID-19 pandemic and related restrictions.²² However, significant recovery and growth followed in subsequent years: +3.6% in 2021, +7.0% in 2022, +6.2% in 2023 and +9.0% in 2024.²¹ In early 2025, growth rates remained high (+10.7% for January–February).⁴²

International organisations forecast some slowdown in growth rates in the medium term to approximately 5–7% as the factors that caused rapid growth (e.g., re-export trade) normalise, but positive dynamics are expected to continue.²¹

The key sector of the economy is services, which account for more than 50% of GDP. Trade (including a significant volume of re-export of Chinese goods), transport services and financial intermediation play a leading role in it.²² Industry, including the mining sector (especially gold mining at the Kumtor deposit, which is the main export product²³) and manufacturing, as well as construction, make a significant contribution to the economy.²³ Agriculture, despite employing a significant part of the population, has a smaller share of GDP and is characterised by relatively low labour productivity.²³

Structural problems of the Kyrgyz economy include high dependence on external factors such as migrant remittances and gold exports, which make it vulnerable to external shocks.²¹ There is a

significant informal economy and unrecorded trade (especially re-export), which complicates accurate assessment of economic indicators and tax collection.²¹ Past political instability created obstacles to long-term economic planning and investment attraction.²³ Despite recent reductions, public debt and the management of large infrastructure projects (e.g., Kambarata-1) require attention to ensure fiscal sustainability.²¹ Governance issues, corruption and relatively low labour productivity are also constraining factors.²³ Although inflation was brought under control after the pandemic-related surge, it remains a potential risk.²¹ This economic structure, dependent on volatile income sources and burdened with structural problems, creates a complex background for consistent, long-term investment in digital infrastructure and digital skills development that are necessary to ensure equal access to information and the realisation of digital rights, despite recent high GDP growth rates.

1.5. OVERALL POLITICAL SITUATION

Kyrgyzstan is officially a presidential republic.⁴⁶ However, the country's political system underwent significant changes after the events of 2020 and the adoption of a new Constitution in May 2021. These changes led to a transition from a parliamentary system of government to a so-called "super-presidential" model, significantly strengthening the powers of the president and weakening the role of parliament (Jogorku Kenesh).⁴⁵ International observers, such as The Economist Intelligence Unit and Freedom House, note an increase in authoritarian tendencies and a decline in the level of political rights and civil liberties in recent years.⁴⁵

The current President of the Kyrgyz Republic is Sadyr Japarov, who took office in January 2021 after early elections.² The Chairman of the Cabinet of Ministers (head of government), appointed by the president, as of May 2025 is Adylbek Kasymaliev.⁵⁰ The country's parliament, Jogorku Kenesh, is unicameral. As a result of the 2021 reforms, its composition was reduced from 120 to 90 deputies, elected under a mixed system (54 from party lists, 36 from single-mandate constituencies).⁴⁵ The current Toraga (Speaker) of Jogorku Kenesh since October 2022 is Nurlanbek Shakiev.⁵¹ The seventh convocation parliament includes several factions and deputy groups, including pro-government "Ata-Jurt Kyrgyzstan", "Mekenchi", "Ishenim", "Yntymak" and opposition/independent "Eldik", "Alliance", "Butun Kyrgyzstan", "Yyman Nuru" and others.⁵¹ Political parties are often characterised as leader-oriented rather than based on clear ideologies, with the influence of competing patronage networks and organised crime on political processes noted.⁴⁵

The administrative-territorial division of Kyrgyzstan includes 7 regions (Batken, Chui, Jalal-Abad, Issyk-Kul, Naryn, Osh, Talas) and 2 cities of republican significance (Bishkek and Osh).⁵ Regions are divided into districts, which in turn are divided into aiyly aimaks (rural districts).⁵⁴

The political context of recent years is characterised by the consolidation of power in the hands of the president after the political upheavals of 2020, constitutional changes and increased pressure on independent media, opposition politicians and non-governmental organisations.⁴⁵ The observed concentration of power and weakening of checks and balances create conditions conducive to increased state control over the information space, including the Internet. This may explain the adoption of restrictive laws (see Section 3) and the increasing cases of prosecution for online statements (see Section 4), as the authorities seek to strengthen control and limit criticism.

2. INTERNET

2.1. NATIONAL DOMAIN

The national top-level domain (ccTLD) for Kyrgyzstan is .KG.⁵⁹ Administration of the domain zone is carried out by the private company OsOO “Asiainfo” (AsiaInfo Telecommunication Enterprise).⁶¹ This right was delegated to the company by the international organisation ICANN. Previously, at least in 2009, the administrator was the State Patent Service of Kyrgyzstan (“Kyrgyzpatent”).⁶⁵

The history of the .KG domain begins with its delegation on 12 July 1995, according to IANA data.⁶² The company “Asiainfo” claims to be the official registrar since 1997 and has been operating in the IT market since 1994.⁶¹ The transition of administration from a state structure to a private company is a common practice in the management of national domains. In 2007, it was noted that the cost of registering a .KG domain was one of the highest in the post-Soviet space.⁶⁶

Registration of domain names in the .KG zone is available to both individuals and legal entities.⁵⁹ The procedure involves submitting an application through the administrator’s website (www.cctld.kg, www.domain.kg) or concluding an agreement at the company’s office.⁵⁹ Individuals are required to provide passport data, and legal entities must provide a registration certificate and bank details.⁶⁰ A domain name is registered for a period of 1 year (365 days) with the possibility of renewal.⁵⁹ There are technical restrictions on names: they cannot begin or end with a hyphen or contain two consecutive hyphens.⁵⁹ The zone administrator has the right to suspend domain delegation in case of providing false registration data.⁵⁹ The requirement to provide identification data during registration, although a standard practice, in the context of the overall political situation and surveillance legislation may raise concerns about the privacy of domain owners, especially those hosting critical content.

2.2. NUMBER OF USERS

Estimates of the number of Internet users in Kyrgyzstan for the period 2019–2025 show significant growth in Internet penetration, but data from different sources vary considerably.

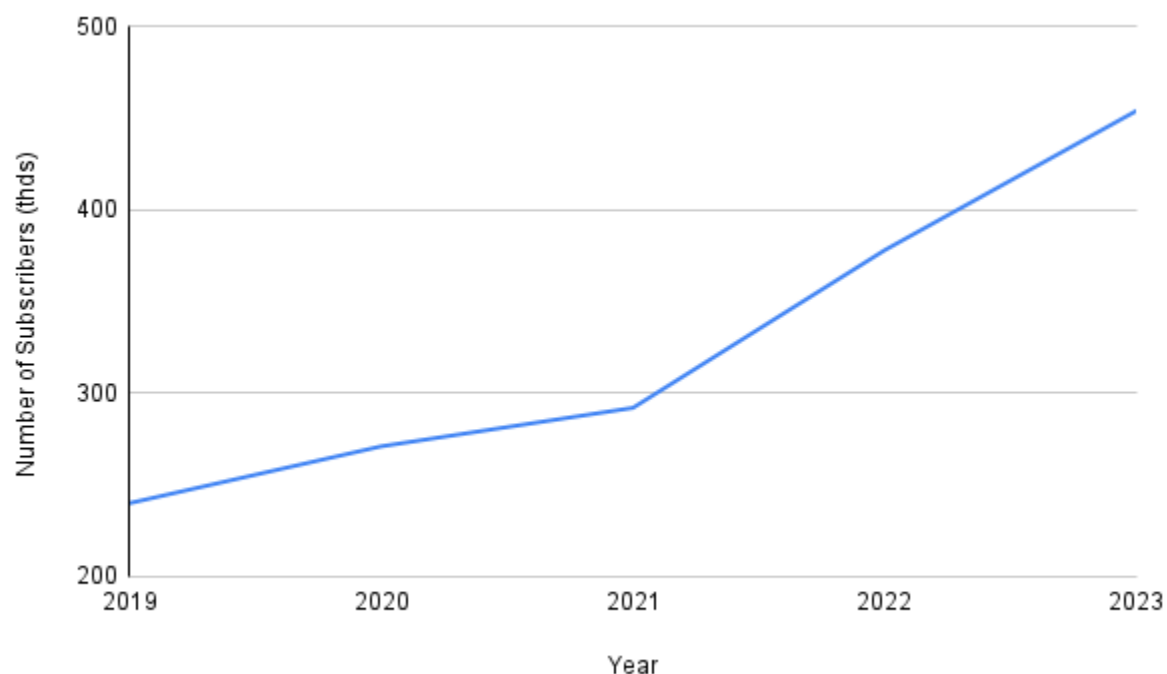
According to DataReportal, the number of users grew from 5.21 million (77.9% of the population) in January 2023 to 6.41 million (88.5%) in January 2025.⁶⁷ Data from the World Bank and the International Telecommunication Union (ITU) also show growth in penetration from 64.1% in 2019 to 88.5% in 2023.⁶⁹ At the same time, data from the Service for Regulation and Supervision in the Communications Sector (SRSCS) under the Ministry of Digital Development of the Kyrgyz Republic, based on operator reports, show even higher figures, often approaching 98% population coverage with active subscriptions, but these data may include inactive SIM cards or multiple subscriptions per user, casting doubt on their accuracy as an indicator of actual usage.⁷⁰ Independent estimates indicate that as of early 2024–2025, about 11–20% of the country’s population still remained offline.⁶⁸

This difference in estimates highlights the complexity of accurately measuring the level of digitalisation. While official subscription data may indicate almost full coverage, estimates of actual usage suggest the persistence of a digital divide affecting a significant portion of the population.

2.2.1 FIXED INTERNET

Fixed broadband access (BBA) to the Internet in Kyrgyzstan remains less common compared to mobile access. The fixed BBA penetration rate, according to ITU, grew from approximately 4% in 2019 to 6.45% in 2023.¹² This indicates slow but steady growth. Infrastructure is developing, with reports of an increase in the length of fibre-optic communication lines⁷⁰, but the availability and quality of services strongly depend on geographic location. In the capital Bishkek and other major cities, infrastructure is more developed, competition is higher, and prices are lower than in rural and mountainous areas where the majority of the population lives.¹²

The low level of fixed BBA penetration indicates a significant gap in access to high-speed and stable Internet. The dominant position of the state-owned OJSC “Kyrgyztelecom” in the market and the lack of transparent data on the market shares of other providers may indicate insufficient competition or barriers to entry for new players, which hinders sector development.⁷⁰

Chart 3: Dynamics of Fixed BBA Subscribers in Kyrgyzstan (2019–2023)

- OJSC “Kyrgyztelecom”: <https://kt.kg/> ⁸⁷
- OsOO “Aknet”: <https://aknet.kg/> (link not found, inferred from ⁸⁶)
- OsOO “ElCat”: <http://elcat.kg/> (link not found, inferred from ⁸⁶)
- OsOO “Mega-Line”: <https://megaline.kg/> ⁸⁹
- OsOO “Homeline”: <https://homeline.kg/> ⁹⁰
- OsOO “Asiainfo”: <https://www.asiainfo.kg/> ⁶¹

2.2.2 MOBILE INTERNET

Mobile Internet is the main way most of the population of Kyrgyzstan accesses the network. 3G network coverage is close to universal, and 4G/LTE networks cover almost all populated areas of

the country.⁷⁰ Testing of 5G technology began in 2022, but commercial launch has been delayed.⁷⁰ The cost of mobile Internet in Kyrgyzstan is considered one of the lowest in the world.¹²

The number of active mobile connections exceeds the country's population (more than 150-160%), indicating widespread use of mobile devices and many users having multiple SIM cards.⁶⁷ Data on the number of mobile BBA subscribers also show high figures, although discrepancies between sources are observed here as well. Competition in the mobile communications market, where four operators operate, helps keep prices relatively low. Nevertheless, the presence of the state as the owner of one of the major operators (MegaCom) and the lack of transparent information on market shares may conceal unequal competition conditions and potentially facilitate state control over mobile communications.

Four main operators operate in the mobile communications market of Kyrgyzstan:

- **Beeline (OsOO "Sky Mobile"):** Part of the international VEON group.⁹³ Website: <https://beeline.kg/>
- **MegaCom (CJSC "Alfa Telecom"):** Nationalised in 2010, state-owned.⁷⁰ Website: <https://megacom.kg/>
- **O! (OsOO "NUR Telecom"):** Private operator claiming market leadership.⁷⁰ Website: <https://o.kg/>
- **KT Mobile (OsOO "KT Mobile"):** Subsidiary of OJSC "Kyrgyztelecom".

Accurate and up-to-date data on the market shares of these operators are not available in open sources.

2.3. INTERNET ACCESS SPEED AND QUALITY OF SERVICES PROVIDED

Internet access speeds in Kyrgyzstan show positive dynamics for both mobile and fixed connections, but the country still lags behind global leaders. Data from Ookla Speedtest Global Index are the main source of information on this indicator.

The median mobile Internet speed has increased significantly in recent years: from approximately 16 Mbps in 2019¹² to 60.77 Mbps in March 2025.⁹⁴ Similarly, the median fixed BBA speed increased from ~23 Mbps in 2019¹² to 118.56 Mbps in March 2025.⁹⁴ Despite this progress, Kyrgyzstan ranks relatively low in the global speed rankings (for example, 81st place for mobile and 80th for fixed in March 2025⁹⁴).

Table 1: Dynamics of Median Internet Speed in Kyrgyzstan (Ookla Speedtest Global Index, Mbps)

Period	Mobile (Download)	Mobile (Upload)	Fixed (Download)	Fixed (Upload)	Source(s)
May 2019	~16.2	-	~23.0	-	Ookla ¹²
January 2023	19.14	-	48.47	-	Ookla ⁶⁷
May 2023	25.20	-	51.43	-	Ookla ⁷¹
January 2024	25.47	-	54.55	-	Ookla ⁷⁴
December 2024	46.43	14.49	79.24	77.66	Ookla ⁹⁵
January 2025	39.71	-	72.95	-	Ookla ⁶⁸
February 2025	47.02	-	74.43	-	Ookla ⁹⁷
March 2025	60.77	18.07	118.56	120.11	Ookla ⁹⁴

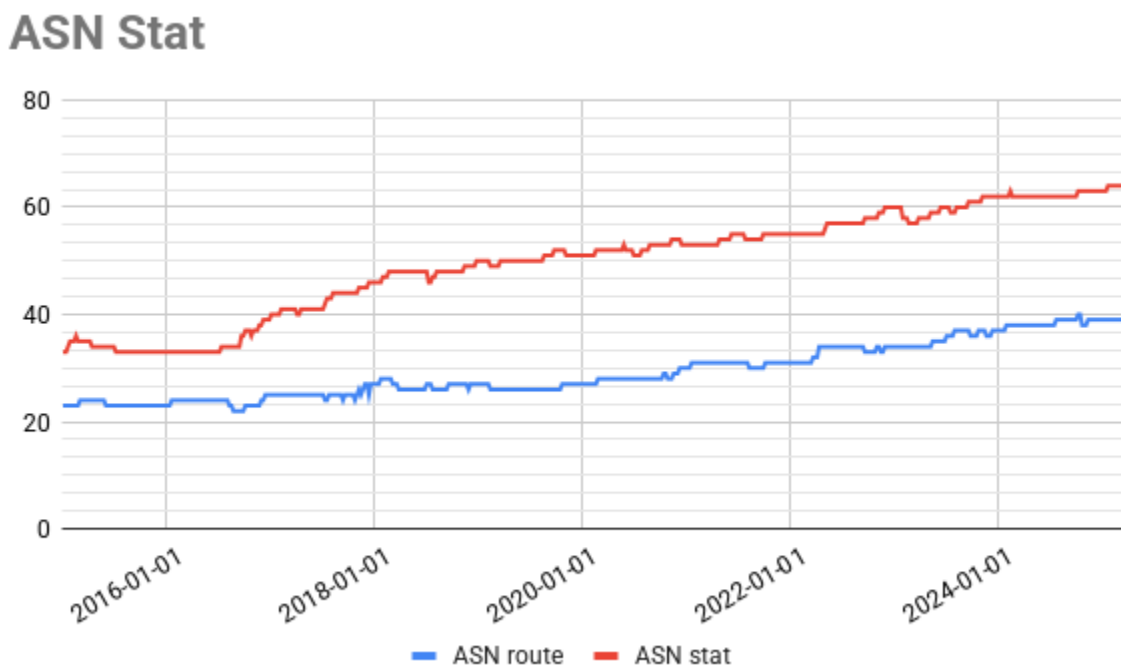
Quality of services remains uneven. Mobile connections, while more accessible, are generally slower and less stable than fixed ones.¹² There is a noticeable gap in quality and prices between the capital Bishkek and rural regions.¹² Infrastructure remains vulnerable to damage and technical failures, which sometimes leads to Internet access interruptions.¹² Improving speed indicators is important, but the persisting gap between fixed and mobile connection quality, as well as between urban and rural areas, highlights the problem of digital inequality and the dependence of a significant part of the population on less stable mobile connections.

2.4. DEVELOPMENT OF PROVIDERS AND AUTONOMOUS SYSTEMS

The development of Internet infrastructure in Kyrgyzstan is reflected in the number of registered Autonomous Systems (AS). An autonomous system is a collection of IP networks and routers

managed by one or more operators that have a single routing policy. According to IPinfo data as of May 2025, 68 Autonomous Systems are registered in Kyrgyzstan.⁹⁸ The largest ASNs by number of allocated IP addresses are OJSC “Kyrgyztelecom” (AS12997), OsOO “Mega-Line” (AS41750), OsOO “ElCat” (AS8449), CJSC “Saima Telecom” (AS29061), OsOO “Aknet” (AS12764) and mobile operators CJSC “Alfa Telecom” (MegaCom, AS50223) and OsOO “NUR Telecom” (OI, AS47237).⁹⁸

Chart 4: Dynamics of Autonomous Systems in Kyrgyzstan (2015–2025)



The chart shows steady and almost continuous growth in the total number of registered autonomous systems (red line, ASN stat) over the past decade. The number of AS has almost doubled, from ~35 in 2016 to 68 in 2025. This indicates the maturity of the Internet market and the

emergence of an increasing number of organisations (Internet providers, large companies, banks, universities) wishing to independently manage their network policy.

A significant and growing discrepancy is observed between the number of registered AS (64) and the number of AS announced in the global routing table (blue line, ASN route) — only 39. This means that almost 40% (25 systems) of registered AS are not used for public traffic routing. Possible reasons:

1. Registration “for future growth” for upcoming projects.
2. Use of AS exclusively for internal needs or for peering at local traffic exchange points (IX) without announcement to the global Internet.
3. Technical or financial difficulties with implementing the BGP protocol and establishing peering connections with upstream providers.

Slowdown in the growth of active systems. Growth in the number of routable AS (blue line) is also observed, but it is less dynamic than the growth in registrations. If in 2016–2018 both curves grew almost in parallel, then from 2019 the gap between them began to increase noticeably. This may indicate market saturation or that new players are not rushing to fully launch their networks.

As of early 2025, the population of Kyrgyzstan is about 7.3 million people. Thus, the total number of AS per 1 million inhabitants: $68/7.3 \approx 9.3$ AS.

This indicator shows that, despite positive dynamics, the level of autonomous system penetration in Kyrgyzstan remains relatively low compared to developed countries, where this figure can be tens of times higher. However, for Central Asia this is a stable indicator reflecting the growth of digitalisation and the development of competition in the Internet services market.

Table 2: Top 10 Largest Autonomous Systems in Kyrgyzstan

#	Number of AS	Name	Web Site	Foreign neighbour count	Local neighbour count	Total neighbour count	Foreign neighbours share
1	8449	EICat	http://www.elcat.kg	29	34	63	46%
2	12764	AKNET-AS		5	21	26	19%
3	61010	IPNet	https://ipnet.kg	11	7	18	61%
4	41750	Megaline Ltd.	http://mega.kg	3	7	10	30%
5	207192	Telcomdata	https://optinetw.orks.kg/	5	2	7	71%

6	47237	nurtel	https://o.kg	0	5	5	0%
7	12997	Kyrgyztelecom	http://www.kt.kg	1	4	5	20%
8	29061	Saimanet Telecommunications	http://www.saimatelecom.kg	0	5	5	0%
9	8511	AS8511-AI Bishkek, Kyrgyzstan		0	4	4	0%
10	61399	KG-IX Route Servers	http://www.ix.kg	2	1	3	67%

The Internet access market in Kyrgyzstan is highly concentrated. ElCat (AS8449) is the undisputed leader in total connections (63 neighbours), significantly ahead of all others.

Key conclusion — critical dependence on foreign providers (transit). Most leading players have a very high share of external connections:

- Telcomdata (AS207192): 71%
- IPNet (AS61010): 61%
- KG-IX Route Servers (AS61399): 67%
- ElCat (AS8449): 46%

This means that most of their Internet traffic is routed through foreign channels rather than through direct connections within the country. Such a structure leads to increased latency and higher traffic costs for end users.

Despite the presence of 64 registered AS, interaction between them within the country (local peering) is at a low level.

Limited number of local connections: Even the leader ElCat has only 34 local neighbours out of a possible 63. For other players this number is even lower.

“One-stop” providers: Companies nurtel (AS47237), Saimanet (AS29061) and AS8511-AI have no direct foreign connections at all. They are completely dependent on purchasing traffic from larger local players (such as ElCat or Kyrgyztelecom) for access to the global network.

Inefficient routes: Weak peering leads to traffic between two users in Kyrgyzstan connected to different providers possibly going through foreign servers (for example, in Russia or Germany) and then returning back.

The presence of KG-IX (AS61399) in the list is a positive sign of Internet infrastructure development. Its task is precisely to stimulate local traffic exchange. However, its indicators (2 foreign and 1 local neighbour) and high share of external connections (67%) suggest that it may not only perform the classic role of a peering point but also provide its participants with access to foreign transit.

Kyrgyztelecom (AS12997), which is historically the state operator, shows a very low number of connections — only 5 (of which 1 is foreign). This is uncharacteristic for a national operator and may indicate its insignificant role in traffic transit compared to more aggressive private companies.

Overall conclusion

The Internet ecosystem of Kyrgyzstan demonstrates growth in the number of participants (as shown in the first chart), but remains highly centralised and dependent on expensive foreign traffic. The key growth point is the development of internal connectivity (peering). Increasing the number of direct connections between local operators, primarily through traffic exchange points (IX), will reduce costs, improve access speeds and increase the overall resilience of the national network.

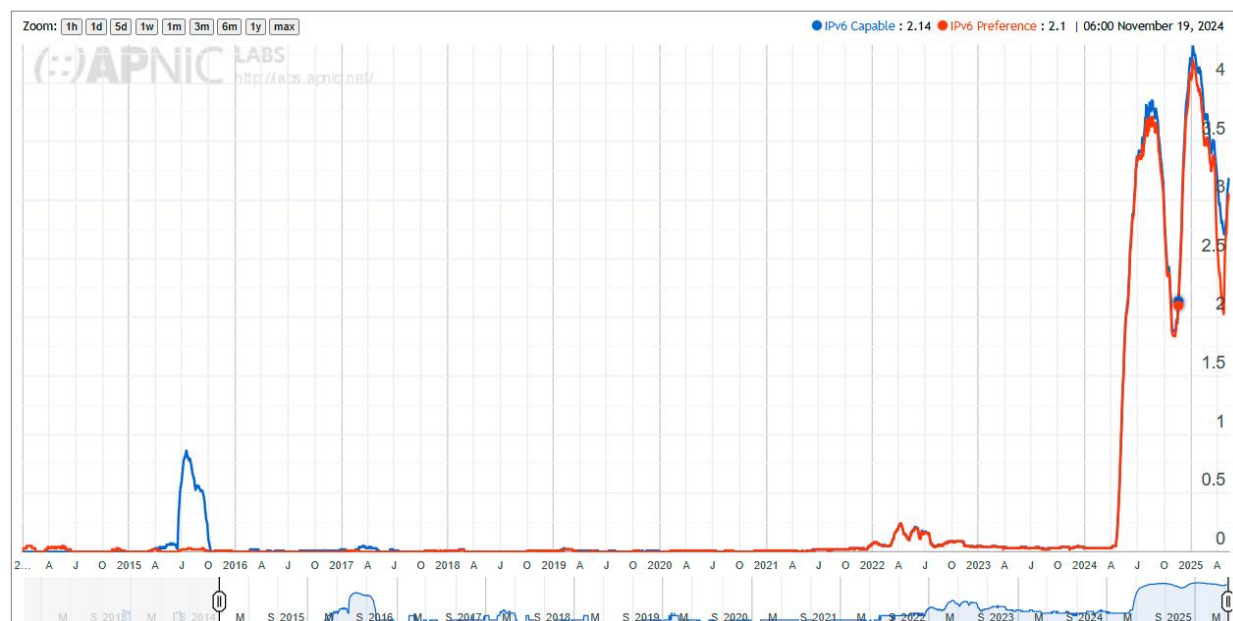
The Internet provider market is characterised by the presence of a large state operator (“Kyrgyztelecom”) and several private companies in both fixed and mobile segments. Providers must obtain licences to operate.⁷⁰ There are barriers to market entry, including high costs of building infrastructure in mountainous terrain and mandatory expenses for installing state surveillance equipment (SORM).¹² The concentration of IP addresses among a few largest ASNs indicates that, despite the possible increase in the number of registered systems, market power remains concentrated in the hands of a limited circle of players, including state companies.

2.5. IPv6 Penetration

Kyrgyzstan significantly lags behind many countries in the world in implementing the IPv6 (Internet Protocol version 6) protocol, which is intended to replace the IPv4 protocol that has exhausted its address space. According to APNIC Labs (Asia-Pacific Network Information Centre), the level of IPv6 support in the country is extremely low. In a StackScale report citing APNIC data for January 2023, the IPv6 adoption rate in Kyrgyzstan was estimated at only 0.05%.¹⁰² The Central Asia region as a whole shows low IPv6 adoption rates compared to other parts of the world.¹⁰³

Chart 5: Dynamics of IPv6 Penetration in Kyrgyzstan (2015–2025)

Use of IPv6 for Kyrgyzstan (KG)



Source: stats.labs.apnic.net

Despite past IPv6 training events (for example, the 6DEPLOY seminar in 2010¹⁰⁵), large-scale implementation of the protocol has not occurred. Such a lag in modernising network infrastructure may create problems in the future, including difficulties in expanding networks, connecting new devices (especially in the context of the Internet of Things - IoT) and potential dependence on expensive and complex address translation mechanisms (CG-NAT), which can negatively affect the operation of some Internet applications and user privacy. The lack of progress in IPv6 implementation indicates possible insufficient investment, a shortage of technical specialists or low priority of this task among the country's key Internet providers.

2.6. Connectivity Index

Two key indicators based on the analysis of pairwise connections (peerings) between Autonomous Systems (ASNs) are used to assess the level of integration of the Internet segment.

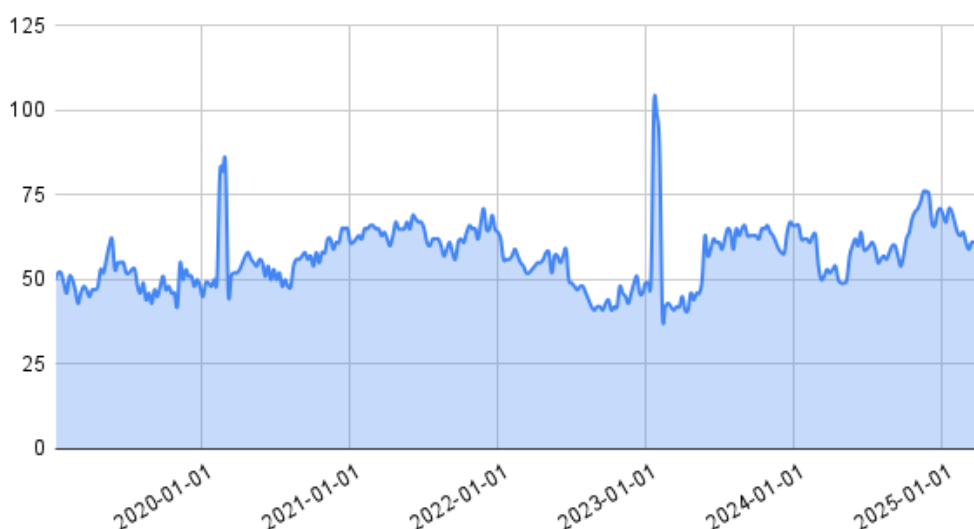
Global Connectivity Index: This index represents the total number of unique connections between each local ASN and each external (foreign) ASN. Essentially, it measures how widely and diversely the Internet segment is connected to the rest of the world. The higher this indicator, the more “windows” the country has to the global network.

Local Connectivity Index: This index is calculated as the total number of unique connections between different local Kyrgyz ASNs. It reflects the intensity and complexity of the domestic Internet market, in particular the activity at traffic exchange points (IXP). A high indicator indicates a developed internal ecosystem that allows efficient traffic exchange within the country, minimising delays and dependence on external channels for local data.

Analysis of the ratio of these two indices makes it possible to understand the strategic orientation of the national network: whether it is predominantly self-sufficient or deeply integrated into the global infrastructure.

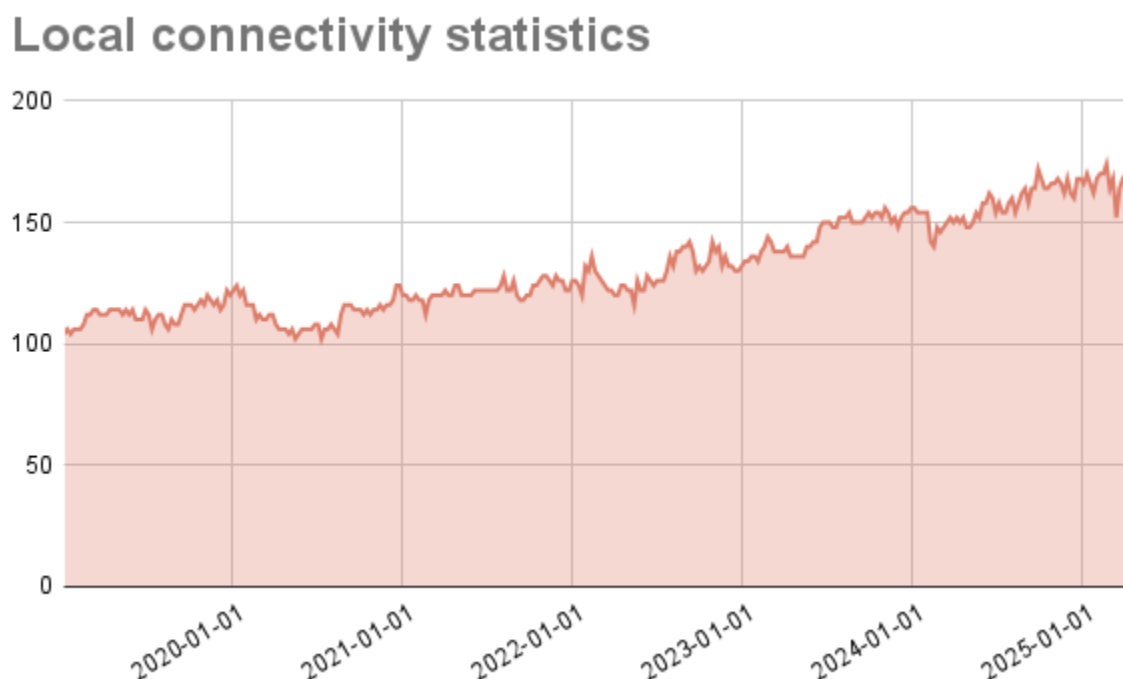
Chart 6: Dynamics of Global Connectivity of Kyrgyz Autonomous Systems (2019–2025)

Global connectivity statistics



This chart shows that the global connectivity of Kyrgyzstan's Internet segment remains stable but stagnant. Over six years, from 2019 to 2025, the base number of unique connections to external networks fluctuates in a narrow range, averaging about 50-60 units. This indicates a lack of diversification and growth in the number of "windows to the world". The country's Internet segment relies on an established but limited pool of foreign partners for access to the global network.

Periodic sharp spikes (for example, at the beginning of 2020 and 2023) indicate short-term anomalies or route reconfigurations rather than sustainable growth. The absence of an upward trend is an alarming signal indicating that dependence on existing channels persists, and new international partners are not appearing, which limits resilience and competition.

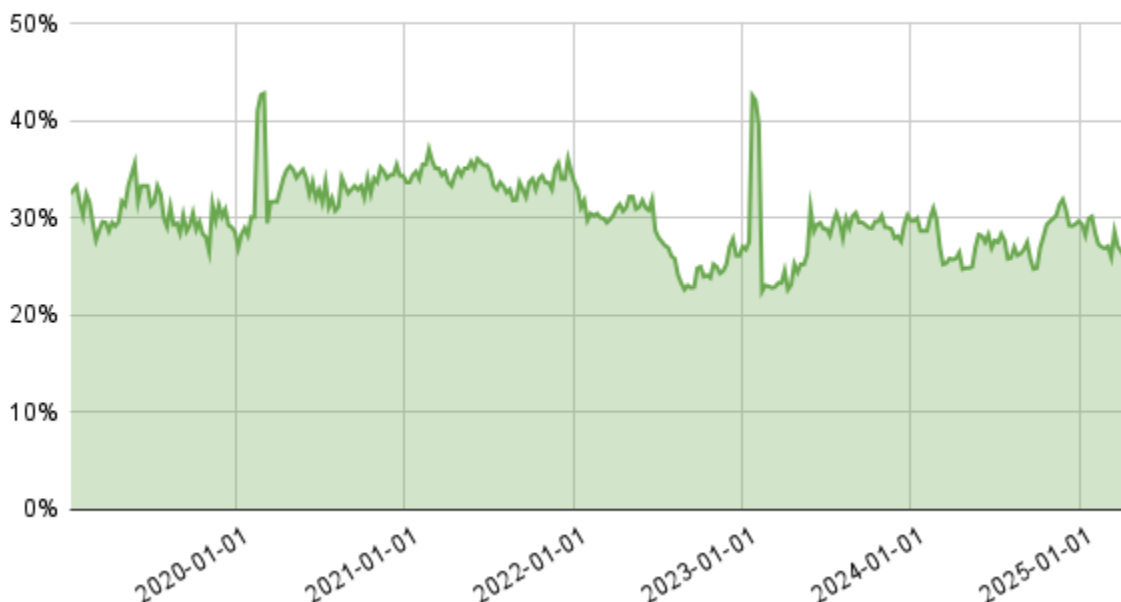
Chart 7: Dynamics of Local Connectivity of Kyrgyz Autonomous Systems (2019–2025)

In contrast to global connectivity, local connectivity demonstrates steady and stable growth. The index increased from approximately 100 units in 2019 to more than 160 by 2025. This is a clear indicator of the development of the domestic Internet market. The growth in the number of unique connections between Kyrgyz operators indicates increased traffic exchange within the country, probably due to the development of traffic exchange points (IXP).

Such dynamics have a positive effect on the quality of Internet services for end users. Traffic between local resources and users increasingly travels short and fast routes within the country, bypassing expensive and slow foreign channels. This increases the speed of access to local content, reduces latency and strengthens the self-sufficiency of the national Internet segment.

Chart 8: Dynamics of the Ratio of Global and Local Connectivity of Kyrgyz Autonomous Systems (2019–2025)

Total connectivity share



This chart shows the share of global connections in the overall connectivity structure, and its downward trend confirms the conclusions from the previous two charts. If in 2019–2021 the share of external connections fluctuated around 30–35%, then by 2025 it dropped and stabilised at 25–30%. This does not mean that the country is isolating itself; it means that internal connectivity is growing much faster than external.

Thus, strategically, Kyrgyzstan’s Internet segment is shifting from a model of strong dependence on external connections to a more balanced and self-sufficient structure. The internal ecosystem is becoming increasingly developed, while the number of entry points to the global network remains virtually unchanged. This indicates the maturation of the domestic market but also highlights the need for future work on diversifying international connections.

3. INTERNET LEGISLATION

3.1. PRINCIPLES OF INTERNET GOVERNANCE

The legislative framework of Kyrgyzstan in the internet sphere declares commitment to the fundamental rights and freedoms enshrined in the Constitution, such as freedom of speech, expression of opinions, freedom of the press, the right to seek, receive and disseminate information.¹⁰⁶ Legislation on personal data also refers to generally accepted international principles and norms.¹⁰⁸ The country's digital transformation concepts set goals to increase the efficiency of public administration, accessibility of services and development of the population's digital skills.¹¹¹

However, an analysis of practical implementation and recent legislative initiatives reveals a growing discrepancy between these declarations and the state's actual policy. The adoption of the laws "On Protection from False (Unreliable) Information", "On Foreign Representatives", as well as the recriminalisation of defamation and insult on the internet, indicate a shift in emphasis towards strengthening state control over the information space and restricting freedom of expression.⁵⁷ The approach to internet governance is increasingly acquiring the features of a state-centric model, where priority is given to security and control considerations, potentially at the expense of the principles of openness and multi-stakeholder participation.

3.1.1. Regulation

Internet regulation in Kyrgyzstan is carried out through a set of laws covering various aspects: from infrastructure and communications to content and data protection. The key regulatory acts are the Constitution of the Kyrgyz Republic, the laws "On Information of a Personal Nature"¹⁰⁹, "On Protection from False (Unreliable) Information"¹¹⁴, "On Electric and Postal Communications"¹⁰¹, "On Mass Media"¹⁰⁶, "On Countering Extremist Activity"¹¹⁸, "On Non-Commercial Organisations" (with amendments on "foreign representatives"⁵⁷), "On Competition"¹²⁰, as well as the Criminal Code and the Code on Offences containing articles concerning cybercrimes and liability for disseminating information.¹¹⁵

The regulatory approach includes licensing of telecommunications operators and internet providers⁷⁰, allocation of radio frequency spectrum⁷², establishment of technical standards⁷⁰, regulation of tariffs in certain segments⁸⁷, and increasingly active content regulation. The latter includes mechanisms for blocking websites and removing information on grounds related to "false

information”, extremism, pornography and other prohibited materials.⁷⁰ In addition, legislation obliges providers to install equipment for monitoring users’ communications.¹² The legislative framework is a combination of relatively old acts (for example, the 1992 Law on Mass Media¹¹³) and recent additions that are often aimed at tightening control. This fragmentation and the presence of potentially contradictory norms create legal uncertainty and risks of arbitrary application of the law.

3.1.2. Regulatory agencies and responsible persons

Responsibility for regulating the internet and communications in Kyrgyzstan is distributed among several state bodies:

1. **Ministry of Digital Development of the Kyrgyz Republic (MDR KR)** – the key body responsible for forming and implementing state policy in the field of digitalisation, information and communication technologies (ICT), e-governance, cybersecurity and communications.⁷⁰ The Ministry also handles licensing in the communications sector, development of standards and management of state information resources, including the population register.⁷⁰
 - Minister (as of May 2025): Azamat Saadabekovich Jamankulov.⁹² (Profile/biography not found on the official website).
 - Official website: <https://digital.gov.kg/>⁹²
2. **Service for Regulation and Supervision in the Communications Sector under the MDR KR (SRSCS)** – a subordinate institution of the MDR that carries out direct regulation and supervision in the communications sector.⁷² Its functions include issuing licences to communications operators, allocation and control of the use of radio frequency spectrum and numbering resources, supervision of operators’ compliance with legislation, detection and elimination of radio interference, issuing conclusions on the import/export of communications equipment, control of technical parameters of radio-electronic equipment, ensuring that operators fulfil obligations in the field of national security and emergency situations.⁷²
 - Chairman (as of May 2025): Altynbek Karypovich Toktorbaev.⁷² (Profile/biography not found on the official website).
 - Page on the MDR website: <https://digital.gov.kg/subordinates/sluzhba-po-regulirovaniyu-i-nadzoru-v-otrasli-svyazi/>⁷²
3. **State Committee for National Security (SCNS)** – the security agency that plays a role in cybersecurity and information control issues. The SCNS initiated the blocking of the TikTok platform⁷⁰ and conducts investigations that can lead to demands for content removal or prosecution of users.¹²⁵

4. **Ministry of Culture, Information, Sports and Youth Policy** – the authorised body for implementing the Law “On Protection from False (Unreliable) Information”, which makes decisions on blocking or removing content based on complaints.¹²⁶
5. **Antimonopoly Regulation Service under the Ministry of Economy and Commerce** – participates in regulating tariffs for certain communications services (e.g. postal¹¹⁷) and supervises compliance with antimonopoly legislation in the market.¹²⁰
 - Official website: <http://antimonopolia.kg>¹²⁹

Such distribution of powers among various agencies, including security structures (SCNS) and bodies responsible for cultural policy, can lead to inconsistency of actions, duplication of functions and insufficient transparency of decision-making processes, especially in the sensitive area of content blocking and user surveillance.

3.2. MARKET MONOPOLISATION

Kyrgyzstan’s legislation, in particular the Law “On Competition”, is aimed at protecting and developing competition, as well as preventing and suppressing monopolistic activity and unfair competition in commodity markets, including telecommunications.¹²⁰ The Law “On Electric and Postal Communications” also declares the right of any legal entity or individual to obtain a licence to operate in the communications market.¹⁰¹ The antimonopoly body participates in regulating certain aspects, for example tariffs for postal services.¹¹⁷

Despite the existence of a legislative framework conducive to competition, the actual situation in the telecommunications market of Kyrgyzstan is characterised by a significant state presence. OJSC “Kyrgyztelecom”, whose controlling stake belongs to the state⁸², remains the largest fixed-line operator and internet provider in the country.⁷⁰ In addition, the state owns one of the four mobile operators – CJSC “Alfa Telecom” (MegaCom trademark), which was nationalised in 2010.⁷⁰

Although private players are present on the market (for example, “Aknet”, “ElCat”, “Mega-Line” in the fixed segment⁸⁶; Beeline, O! in the mobile segment⁷⁰), the dominant position of state-owned companies creates a de facto market concentration or state dominance situation. This is exacerbated by the lack of clear obligations for infrastructure sharing and high initial costs for new players, including mandatory expenses for SORM equipment.¹² The lack of up-to-date and transparent data on market shares makes it difficult to assess the real level of competition. This state of affairs can hinder innovation, limit consumer choice and facilitate state control over the country’s communication infrastructure.

3.3. INTERNET SHUTDOWNS ORDERED BY AUTHORITIES

Kyrgyzstan's legislation does not contain a special law that directly authorises a complete internet shutdown in ordinary times. The Constitution guarantees freedom of speech and information.¹⁰⁶ However, the Constitutional Law “On State of Emergency” grants the authorities managing the emergency regime (introduced by presidential decree and approved by Parliament¹³⁰) the right to “introduce special rules for the use of communications” (Article 15, paragraph 15).¹³¹

This wording is broad enough and could theoretically be interpreted as grounds for restricting or completely shutting down access to the internet and other types of communications in the territory where a state of emergency has been declared. The law does not specify exactly what “special rules” can be introduced, who exactly issues the order for their introduction (temporary administration or commandant¹³⁰), or what procedures must be followed. This creates legal uncertainty and the potential for abuse in crisis situations. Officials stated that there were no plans to shut down the internet during the state of emergency introduced due to COVID-19.¹³²

The Law “On Protection from False (Unreliable) Information” provides for a procedure for blocking specific websites or pages, but not a complete network shutdown.¹¹⁴ Thus, although there is no direct law on shutdowns, the legislation on states of emergency contains provisions that could be used to justify such measures in exceptional circumstances, while clear procedural guarantees and restrictions are absent.

3.4. LEGISLATION ON “ONLINE SPEECH”

Kyrgyzstan's legislation concerning online speech has undergone significant changes in recent years aimed at tightening control and increasing liability for disseminating certain information.

The key act was the Law “On Protection from False (Unreliable) Information” (No. 103), adopted in August 2021.¹¹⁴ This law, often called the “law on fakes”, allows the authorised state body (Ministry of Culture, Information, Sports and Youth Policy¹²⁷) to demand the removal of information from a website or page if it is deemed “false (unreliable)” based on a complaint from an individual or legal entity. If the site owner or hosting provider refuses to comply within 24 hours, access to the resource can be blocked by internet providers on the instructions of the regulator (SRSCS).¹¹⁴ It is important to note that the initial blocking decision is made without a court order, which has drawn serious criticism from human rights organisations as a threat to freedom of speech and a tool of censorship.¹¹⁴ The law does not provide a clear definition of “false (unreliable)” information, leaving wide scope for officials' discretion. The law also obliges internet providers to collect user data for a

unified state identification system, thereby enhancing surveillance capabilities.¹¹⁴ The law's application includes the blocking of the Radio Azattyk website¹²⁶ and attempts to block Kloop.kg.¹³⁶

In February 2025, amendments to the Code on Offences entered into force, effectively recriminalising defamation and insult disseminated in the media and on the internet.¹¹⁵ Previously, defamation had been decriminalised in 2011 and insult in 2015.¹¹⁵ The new norms provide for administrative fines (up to 65,000 soms for organisations and 20,000 soms for individuals¹¹⁵), which are imposed following expedited proceedings in administrative courts.¹¹⁵ This change has been criticised by the Committee to Protect Journalists (CPJ) and local media experts as a step backwards and a tool for rapid financial pressure on independent media and bloggers.¹¹⁵

In addition, liability for online speech may arise under Criminal Code articles related to incitement to hatred, calls for mass disorder or violent seizure of power. These articles are actively used to prosecute activists and journalists for their social media posts.⁵⁸ There are also general norms prohibiting the dissemination of discriminatory content, interference in private life and disclosure of investigation secrets.¹⁰⁶ Draft amendments to the Law on Mass Media that would have introduced liability for content calling for riots, promoting “non-traditional sexual relations” or harming “public morality” were discussed but withdrawn for revision.¹¹³

Taken together, these legislative acts and trends create a legal environment in which the state has significant powers to control online discourse, restrict criticism and prosecute individuals for their internet statements, which has a noticeable chilling effect on freedom of speech in the country.

3.5. LEGISLATION ON INTERNET BLOCKING

Blocking of internet resources in Kyrgyzstan is carried out on the basis of several legislative acts and administrative procedures. The main reasons for blocking are the dissemination of “false (unreliable) information”, extremist materials, child pornography, as well as content related to war propaganda, violence and cruelty. In recent years, there has been a trend towards expanding the grounds and simplifying blocking procedures, often bypassing judicial oversight.

3.5.1. Legislation

The main tool for blocking websites has become the Law “On Protection from False (Unreliable) Information” (No. 103 of 23 August 2021).¹¹⁴ It allows blocking web resources without a court decision based on a complaint about the dissemination of false information.¹¹⁴

Legislation on countering extremist activity also serves as a basis for blocking resources. The exact procedures and criteria for applying these norms are often opaque, and the concept of “extremism” can be interpreted broadly.⁷⁰

In 2025, a bill was discussed aimed at blocking sites with pornographic content, providing for rapid blocking (within 24 hours) at the request of the authorised body.¹²³

In addition, blocking can be carried out on the basis of court decisions in other categories of cases (for example, copyright infringement, protection of honour and dignity), as well as potentially at the request of national security agencies within the framework of counter-terrorism activities or protection of state secrets, although the specific mechanisms in these cases are less clear from available sources.¹⁰⁸

3.5.2. Blocking procedures

The blocking procedure under the Law “On Protection from False (Unreliable) Information” is as follows:

1. An individual or legal entity submits a complaint about false information to the authorised body (Ministry of Culture).¹¹⁴
2. The authorised body reviews the complaint and, if the information is deemed false, sends the site or page owner a demand to remove the information.¹¹⁴
3. The resource owner is obliged to remove the information within 24 hours.¹²³
4. If the demand is not fulfilled, the authorised body applies to SRSCS with a request to block access to the site or page.¹¹⁴
5. Internet providers are obliged to block access to the resource.¹¹⁴
6. The resource owner can appeal the blocking decision in court, but only after the blocking has already been carried out.¹²⁷

The procedure for blocking on grounds of combating extremism or protecting national security is less transparent and is probably initiated by law enforcement agencies or the SCNS, possibly through court warrants or direct instructions to providers.

Technically, blocking can be implemented in various ways, including blocking by IP address, DNS blocking or more sophisticated methods of deep packet inspection (DPI) and interference with TLS connections, which are harder for users to detect.¹³⁹

3.5.3. Registries of blocked internet resources

Kyrgyzstan does not have a single, official, publicly available state registry of all blocked internet resources. The Law “On Protection from False (Unreliable) Information” mentions the creation of a “unified identification system” for collecting user data from providers¹¹⁴, but not a public registry of blocked sites.

Some internet providers, on their own initiative or at the regulator’s request, may publish lists of resources blocked by them. For example, the provider Mega-Line has a section on its website with a list of blocked resources and blocking dates.⁸⁹ However, such lists are incomplete, reflect only the blocking by a specific provider and often contain resources of a specific nature (for example, escort service websites).

The absence of a single and transparent registry makes public oversight of blocking practices difficult, as well as assessment of their scale and legality. Decisions on blocking, especially those made on national security or anti-extremism grounds, may remain classified.

As noted above, there is no single official registry. Only separate lists published by some providers are available:

- **Mega-Line list of blocked resources:**

<https://megaline.kg/klientam/zablokirovannyye-resursyi/>.⁸⁹ This list contains a limited number of domains blocked domains. As of January 2025, it mainly lists sites related to escort services and intimate massage. The list does not reflect blocking for political or informational reasons.

- **“Black list” on migrant.kg:** <https://www.migrant.kg/ru/services/black-list/>.¹⁴⁰ This resource is not a registry of blocked sites. It is a database of the Centre for Employment of Citizens Abroad (under the Ministry of Labour, Social Security and Migration) that allows citizens to check whether they have restrictions on leaving the country or entering other countries (in particular Russia) through migration services.

The absence of an official registry is a significant shortcoming of the internet regulation system in Kyrgyzstan, reducing its transparency and accountability.

3.5.4. Development of blocking practices

Internet censorship monitoring in Kyrgyzstan is carried out by international organisations such as the Open Observatory of Network Interference (OONI), which collects data on blocking using its OONI Probe application.¹³⁹ OONI data show the presence of blocking in the country, although as of

May 2025 the volume of collected data was insufficient to build detailed graphs on the OONI Explorer platform.¹⁴¹

Key trends and blocking cases for the period 2019–2025 recorded by OONI and other sources (Freedom House, Access Now, news reports):

- **TikTok blocking:** Since April 2024, by order of the SCNS through SRSCS, most providers have blocked access to the TikTok platform. The official reason was the protection of children from harmful information.⁷⁰ The blocking continued in 2025.¹⁴²
- **Media blocking:**
 - The website of Radio Azattyk (RFE/RL) was blocked in October 2022 under the Law “On Protection from False (Unreliable) Information” due to material about the border conflict with Tajikistan.¹²⁶
 - The website of the publication Kloop.kg has been subject to blocking or attempted blocking since September 2023.¹³⁶
- **Targets of blocking:** Blocking is often aimed at restricting access to independent news resources, social platforms and content related to politically sensitive topics such as criticism of the authorities, corruption, territorial issues.⁵⁸
- **Methods:** Various technical methods are used, and there are concerns about the use of less transparent blocking methods such as interference with TLS.¹³⁹

Conclusion: The practice of internet blocking in Kyrgyzstan has noticeably intensified in recent years. The authorities use both legislative tools (in particular, the “law on fakes”) and administrative levers (SCNS instructions) to restrict access to information. The main targets are popular social platforms and independent media criticising government actions. The opacity of procedures, the lack of full judicial control at the initial stage and the absence of a single public registry of blocked resources raise serious concerns about compliance with freedom of speech and access to information in the country. This trend towards increased censorship corresponds to the overall deterioration of the human rights and media freedom situation observed in the country.

4. HUMAN RIGHTS VIOLATIONS ON THE INTERNET

The situation with observance of digital human rights in Kyrgyzstan causes serious concern among international and local human rights organisations. Reports by Human Rights Watch, Amnesty

International, Freedom House, CPJ, RSF and local NGOs point to a noticeable deterioration, especially after 2020–2021.⁴⁵ The main violations include restriction of access to information through website and platform blocking, increased pressure on independent media and journalists, as well as criminal and administrative prosecution of citizens for their internet statements.

These trends are developing against the background of overall power consolidation and the adoption of legislation that expands the state's ability to control the information space. There is systematic use of legal mechanisms to suppress criticism and dissent in the digital environment.

4.1. INTERNET SHUTDOWNS ORDERED BY AUTHORITIES

Cases of complete internet shutdowns (shutdowns) throughout Kyrgyzstan or in individual regions by direct order of the authorities in the period from 2019 to 2025 were rare, but did occur.

- **October 2020:** The most obvious case occurred during the political crisis and mass protests after the parliamentary elections. NetBlocks recorded significant internet disruptions in Bishkek on the evening of 5 October 2020, coinciding with the dispersal of protesters.¹⁴⁵ This shutdown was regarded by observers as a deliberate action by the authorities to hinder protest coordination and information dissemination.
- **October 2022:** During protests against the transfer of the Kempir-Abad reservoir to Uzbekistan, internet access problems were observed in Bishkek and other areas.⁷⁰ However, communications operators explained this as technical problems with an upstream provider, and international monitoring resources did not confirm the deliberate nature of the shutdown by the Kyrgyz authorities.⁷⁰ Nevertheless, the coincidence with the protests raised public suspicion.
- **January 2022:** A large-scale power outage affecting Kyrgyzstan, Kazakhstan and Uzbekistan led to serious internet disruptions, but it was related to an accident in the power system, not targeted actions by the authorities.¹⁴⁶

Although full-scale shutdowns were rare, the confirmed incident in October 2020 and the nationwide blocking of the TikTok platform since April 2024⁷⁰ demonstrate that the authorities possess both the technical capability and the political will to interfere with network access. There is a shift from complete shutdowns to more targeted blocking of specific platforms or sites as the main tool for controlling information flows.

4.2. CRIMINALISATION OF ONLINE SPEECH

Kyrgyzstan is witnessing an alarming trend of prosecuting citizens for their online speech, including social media posts, comments and publications. Both administrative and criminal articles are used for this.

The recriminalisation of defamation and insult on the internet in February 2025 through amendments to the Code on Offences created a mechanism for imposing administrative fines on citizens (20,000 soms) and organisations (65,000 soms) in an expedited procedure.¹¹⁵ This is regarded as a tool of pressure capable of leading to self-censorship due to fear of fines.

More serious consequences arise from the application of Criminal Code articles. The authorities increasingly use charges of “inciting mass disorder”, “inciting hatred (discord)” or “calls for violent seizure of power” to prosecute individuals criticising the government or raising acute social and political issues online.

The most high-profile cases of prosecution for online speech (2019–2025):

- **Oljobay Shakir:** Writer and activist known for criticising the authorities on social media; arrested in August 2023 and later sentenced to five years’ imprisonment on charges of inciting mass disorder and attempting violent seizure of power. The charges were related to his online statements, in particular concerning the transfer of land on Lake Issyk-Kul.⁷⁰
- **Adilet Ali Myktybek (Adilet Baltabay):** Popular blogger; detained in June 2022 on suspicion of inciting mass disorder due to posts on his Facebook page.¹³⁸ He was held in custody for a long time.
- **Joomart Karabaev:** Employee of the National Academy of Sciences; arrested in July 2024 on charges of inciting mass disorder for social media posts and public statements in which he claimed pressure from the SCNS on Academy members to falsify expert opinions in cases of critics of the authorities.⁵⁸
- **Aftandil Jorobekov:** Activist and blogger; detained in 2019.¹⁴⁷ Details of the charges are not specified in the source, but mentioned in the context of prosecution for social media activity.

These cases demonstrate the use of criminal legislation to suppress criticism and dissent expressed through digital platforms. The charges are often vague (“incitement to disorder”), which allows them to be applied to a wide range of statements, creating an atmosphere of fear and restricting freedom of speech on the internet.

4.3. PERSECUTION OF MEDIA AND NGOS

Independent mass media and non-governmental organisations in Kyrgyzstan face growing pressure from the authorities, manifested in various forms, including legal prosecution, blocking of online resources and the adoption of restrictive legislation. This pressure has intensified after 2020.¹¹⁵

Media persecution:

- **Website blocking:** The authorities actively use the Law “On Protection from False (Unreliable) Information” to block independent media websites.
 - **Radio Azattyk (RFE/RL):** The site was blocked in October 2022 over a report on the border conflict.¹²⁶ Later, the Ministry of Culture filed a lawsuit to terminate the media organisation’s activities, and the Bishkek district court ruled to close it in April 2023.¹⁴³
 - **Kloop.kg:** The site of this influential investigative outlet has been subject to blocking or attempted blocking since September 2023.¹³⁶ In September 2024, the Supreme Court upheld the decision to liquidate the Public Foundation “Kloop Media” on the prosecutor’s lawsuit accusing the outlet of lacking registration as a mass media and calling for anti-government protests.⁵⁷
- **Criminal cases against journalists:**
 - **Temirov Live case:** In January 2024, 11 current and former employees and persons associated with the anti-corruption investigation project were arrested. In October 2024, four of them were found guilty on charges including incitement to mass disorder; two were sentenced to prison terms, two to probation.⁵⁷
- **Legal pressure:**
 - **Aprél TV:** In April 2025, the prosecutor’s office filed a lawsuit to terminate the activities of the TV channel (broadcasting online and through partners) due to allegedly “negative” coverage of the authorities’ activities, which, according to the prosecution, undermines the government’s authority and may provoke unrest.¹²⁵
 - **Recriminalisation of defamation:** The introduction of administrative liability for defamation and insult in the media and on the internet (February 2025) creates a financial threat to editorial offices.¹¹⁵
 - **Draft law on mass media:** Although the draft law on mass media, which caused sharp criticism for tightening accreditation rules and introducing liability for a wide range of content, was withdrawn for revision in March 2024, the very fact of its development indicates the authorities’ intention to strengthen control.¹¹³

Persecution of NGOs:

- **Law “on foreign representatives”:** Adopted in April 2024, the law⁵⁷, similar to Russia’s “foreign agents” law, requires NGOs receiving foreign funding and engaging in “political activity” (the term is vaguely defined) to register in a special registry. This entails enhanced state control, including the right of officials to attend NGO events and check their expenses, as well as reputational risks.⁵⁷ According to reports, some NGOs preferred to self-liquidate or re-register as commercial organisations.⁵⁷ The law drew sharp criticism from the UN.⁵⁷ President Japarov promised that there would be no prosecutions after the law’s adoption.¹¹⁹
- **Draft law on NGOs:** Since 2022, another bill initiated by the presidential administration has been discussed, which contains extremely restrictive provisions on the registration and activities of NGOs, further expanding the state’s supervisory powers.⁵⁷

These actions have led to a significant drop in Kyrgyzstan’s position in international press freedom rankings. According to Reporters Without Borders (RSF), the country fell from 79th place in 2021 to 120th in 2024.¹⁴⁴ There is a systematic campaign to restrict the activities of independent media and critically minded NGOs using legislative, administrative and legal instruments, which seriously undermines freedom of speech and civic space in the country, including in the online sphere.

5. CIVIL SOCIETY IN INTERNET GOVERNANCE

Civil society in Kyrgyzstan has traditionally played an active role in the country’s socio-political life, including on issues related to the internet and digital rights.¹⁴⁸ Civil society organisations engage in monitoring legislation, human rights activities, providing legal assistance, conducting research and educational events.¹⁴⁹ Digital technologies provide new opportunities for citizen mobilisation and increased transparency, but also create challenges such as the spread of disinformation and digital inequality.¹⁴⁸

However, in recent years civil society has faced serious pressure from the authorities. The adoption of the law “on foreign representatives”⁵⁷ and the general tightening of control over the information space create an unfavourable environment for the work of NGOs, especially those involved in human rights protection and criticism of state policy.

5.1. Organisations

Several organisations in Kyrgyzstan specialise in digital rights, internet freedom and media law, while other human rights groups include these issues in their broader agenda:

- **Public Foundation “Institute of Media Policy” (IMP):** Leading organisation specialising in media law. Provides legal assistance to journalists and media, represents their interests in courts, monitors legislation and judicial processes, develops analytical materials and recommendations for improving legislation in the information sphere, engages in media literacy.¹¹⁸
 - Website: <https://media.kg/>¹⁵¹
- **Public Foundation “Civil Initiative on Internet Policy” (CIIP):** Deals with internet governance, digital rights, cybersecurity, personal data protection, countering online extremism, open data and digital transformation. Conducts legal analysis of legislation, develops recommendations, organises trainings and events (e.g. Central Asian Internet Governance Forum – CAIGF).¹⁵⁰
 - Website: <https://internetpolicy.kg/>¹⁵⁰
- **Human Rights Movement “Bir Duino-Kyrgyzstan”:** A large human rights organisation providing free legal assistance to vulnerable groups. Although the main focus may be on other rights (e.g. fight against torture), the organisation also defends activists and may address digital rights issues in the context of prosecution for expression of opinion.¹¹⁸
 - Website: <https://birduino.kg/>¹⁵³
- **Human Rights Centre “Kylym Shamy”:** Organisation headed by the well-known human rights defender Aziza Abdirasulova, actively engaged in protecting the rights of activists detained or persecuted for their activities, including online statements.⁵⁸
 - Website: (not found in sources)
- **Legal Clinic “Adilet”:** Provides legal assistance and analyses legislation affecting human rights, including freedom of speech and access to information.¹⁰⁷
 - Website: <https://adilet.kg/>¹⁰⁷

These and other organisations form an important ecosystem for the protection of digital rights and internet freedom in Kyrgyzstan, providing expertise, legal support and criticising restrictive initiatives of the authorities, despite the growing risks and unfavourable political environment.

5.2. VPN AND CIRCUMVENTION TOOLS

Against the background of increasing blocking of internet resources (media, social platforms) in Kyrgyzstan, the use of VPN (Virtual Private Network) and other circumvention tools is becoming relevant for users seeking access to blocked content.¹⁵⁷ VPN services allow users to hide their real IP address and route traffic through a server in another country, thereby bypassing geographical and censorship restrictions.

There is awareness of the risks associated with using, especially free, VPN services, which may collect and sell user data.¹⁵⁸ It is recommended to use paid services with a good reputation and a no-logs policy.¹⁵⁸

5.2.1. Status of VPN services

As of May 2025, the use of VPN services in Kyrgyzstan remains **fully legal**.¹⁶⁰ The country's legislation contains no direct prohibitions or restrictions on the use of VPN by citizens for personal purposes.

However, as in many countries, it is emphasised that using a VPN does not exempt one from liability for committing illegal actions on the internet. Using a VPN for illegal activities can entail legal consequences.¹⁶⁰

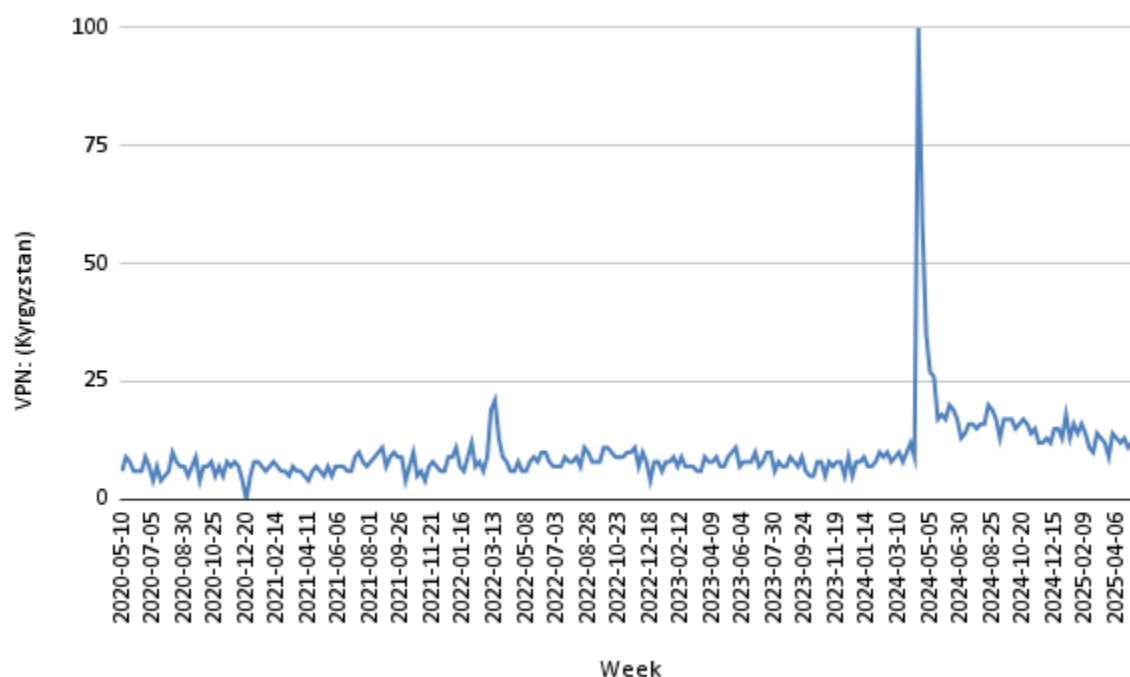
No specific laws regulating the advertising or sale of VPN services in Kyrgyzstan were found in the provided sources. Given the general trend towards increased internet control and the blocking of the TikTok platform, the possibility of introducing restrictions on VPN use of VPN in the future cannot be ruled out, similar to the practice in neighbouring countries or Russia, where authorities try to oblige VPN services to connect to state blacklists or block their protocols.¹⁶¹

5.2.2. Number of VPN users

Reliable statistical data on the number of VPN users in Kyrgyzstan for the period from 2019 to 2025 are not available in open sources.¹⁵⁹ Studies and reports often focus on global trends or on countries with strict restrictions (for example, Turkmenistan¹⁶², Iran, China¹⁶³).

However, surges in demand for VPN services are observed during periods of political tension or the introduction of blockings. For example, the organisation Top10VPN recorded a 147% increase in demand for VPNs in Kyrgyzstan on 22 October 2022, on the eve of planned protests.¹⁶³ Demand most likely also increased after the blocking of TikTok in April 2024, although no specific figures are available.

Blocking of VPN services: No direct evidence of targeted mass blocking of VPN services themselves or their protocols in Kyrgyzstan was found in the studied sources. However, the authorities may attempt to block IP addresses of well-known VPN servers or use DPI systems to detect and block VPN traffic, as is done in other countries.¹⁶¹ The effectiveness of such measures may be limited, since many VPN services use technologies to bypass blockings.¹⁶¹

Graph 9: Dynamics of search queries for VPN in Kyrgyzstan (2020–2025)

Source: *trends.google.com*

Analysis of the graph of search queries for “VPN” in Kyrgyzstan from 2020 to 2025 reveals two key trends. First, there are long periods of relatively low and stable interest in this technology, which indicates its niche use in normal times. Second, against this background, there is an anomalous, explosive peak in popularity in May 2024, when interest in VPN reached the maximum value of 100 points. After this peak, interest decreased slightly but remained at a level exceeding the indicators before May 2024, which indicates the emergence of a new, broader user audience.

This unprecedented surge is directly linked to the mass riots that occurred in Bishkek on the night of 17–18 May 2024. The conflict, which began with a fight between local residents and foreign students, escalated into spontaneous unrest and attacks on dormitories where foreigners lived. In such crisis situations, the authorities, in order to control the information space and suppress the coordination of protesters, often resort to restricting internet access. As a rule, this is expressed in the blocking of social networks, messengers and news resources. It was precisely this reaction from the authorities that became the catalyst for the sharp increase in demand for VPN services, which for citizens became the only tool to bypass censorship, gain access to objective information and secure communication.

5.2.3. Cases of persecution for using VPN

No information was found in the studied sources about cases of criminal or administrative prosecution of **citizens** of Kyrgyzstan **specifically for the very fact of using VPN**. As noted, the use of VPN in itself is legal.¹⁶⁰

There are also no data on the persecution of **organisations providing VPN services** on the territory of Kyrgyzstan. Most popular VPN services are international companies without a physical presence in the country.

However, it should be borne in mind that using a VPN to access resources recognised as extremist or containing other prohibited information may theoretically be used as an aggravating circumstance or an additional element in cases related to the dissemination of such information.

5.2.4. Monitoring of blockings

Monitoring of internet resource blockings in Kyrgyzstan is carried out by several organisations and platforms, although systematic and comprehensive monitoring is hampered by the absence of an official public registry.

- **OONI (Open Observatory of Network Interference):** An international project that collects data on censorship using the OONI Probe application. Data for Kyrgyzstan are available on the OONI Explorer platform, but their volume may be limited.¹³⁹ OONI recorded the blocking of TikTok in 2024.¹⁴¹
- **NetBlocks:** An organisation that tracks internet outages and shutdowns worldwide. It recorded disruptions in Kyrgyzstan in October 2020 during protests and in January 2022 due to a power system failure.¹⁴⁵
- **Access Now (#KeepItOn):** An international human rights organisation that documents internet shutdowns and platform
- **Local NGOs and media:** Organisations such as the Institute of Media Policy, CIIP, Kloop.kg, Radio Azattyk, 24.kg, Kaktus.media, Factcheck.kg monitor and report cases of blockings, legislative initiatives and persecutions related to the internet.¹²⁶
- **Providers' lists:** Some providers (for example, Mega-Line⁸⁹) publish limited lists of resources blocked by them.

Digest of blocking reports (2019–2025):

- **2020:** Internet disruptions during the October protests.¹⁴⁵

- **2021:** The Law “On Protection from False (Unreliable) Information” was adopted, creating a mechanism for extrajudicial blockings.¹¹⁴
- **2022:** Blocking of the Radio Azattyk website (October).¹²⁶ Internet disruptions during the Kempir-Abad protests (October), but not officially confirmed as a shutdown.⁷⁰
- **2023:** Attempts to block the Kloop.kg website (September).¹³⁶ Court decision to liquidate Azattyk Media (April).¹⁴³
- **2024:** Nationwide TikTok blocking (from April).⁷⁰ Court decision to liquidate Kloop Media (September).⁵⁷
- **2025:** Prosecutor’s lawsuit to close April TV (April).¹²⁵ Recriminalisation of online defamation and insult (February).¹¹⁵

This digest shows the escalation of restrictive measures, especially since 2021–2022, with the transition from temporary disruptions to systematic blocking of major platforms and independent media using the new legislation.

6. Conclusion

The analysis of the state of the internet and digital rights in Kyrgyzstan for the period from 2019 to 2025 reveals a complex and contradictory picture. On the one hand, there is significant growth in internet penetration, especially mobile, improvement of speed characteristics and development of digital services.⁶⁸ The country demonstrates efforts in digital transformation aimed at increasing the efficiency of public administration and accessibility of services for citizens.¹¹¹

On the other hand, this period was marked by a significant deterioration in the situation with freedom of speech and digital rights. The adoption of restrictive laws such as the law “on fakes”¹¹⁴ and the law “on foreign representatives”⁵⁷, the recriminalisation of defamation and insult on the internet¹¹⁵, as well as the practice of blocking popular platforms (TikTok⁷⁰) and independent media (“Azattyk”, Kloop.kg⁵⁷) testify to the strengthening of state control over the information space. Cases of persecution of journalists, bloggers and activists for their online statements using criminal and administrative charges have become more frequent.⁵⁷

The concentration of power within the framework of the “super-presidential” system⁴⁵, the opacity of blocking procedures¹²⁸, the absence of a single public registry of blocked resources and the significant presence of the state in the telecommunications market⁷⁰ create an environment favourable for further restriction of digital freedoms. Although full-scale internet shutdowns are rare¹⁴⁵, the possibility of their application under the legislation on state of emergency remains.¹³¹

Forecast for the development of events:

- **Neutral scenario:** Maintaining the current status quo. Slow improvement of infrastructure and internet speed will continue, but the digital divide between city and countryside will persist. The authorities will continue to use existing legislation for targeted blocking of undesirable resources and persecution of individual critics, avoiding mass repressions or complete shutdowns so as not to provoke widespread international condemnation. The level of self-censorship among users and media will remain high.
- **Positive scenario (Liberalisation):** Unlikely under current conditions, but theoretically possible with a change of political course or under strong pressure from civil society and international partners. This scenario involves reviewing and repealing the most notorious laws (“on fakes”, “on foreign representatives”, recriminalisation of defamation), stopping the persecution of journalists and activists, ensuring judicial independence in cases related to online content, and introducing transparent blocking procedures with mandatory judicial oversight. Possible stimulation of competition in the telecommunications market and active investments in overcoming the digital divide.
- **Negative scenario (Strengthening censorship):** Further tightening of control over the internet. A new, even more restrictive law on mass media¹¹³ or on NGOs may be adopted.⁵⁷ Attempts may be made to block VPN services¹⁶¹ or to introduce stricter user identification measures. Pressure on the remaining independent online resources and activists will intensify. More frequent platform blockings or even local shutdowns in response to social or political unrest are not excluded, despite official assurances to the contrary.¹³² This scenario corresponds to the trend observed in recent years.

Overall, the current trajectory indicates the predominance of risks associated with the restriction of digital rights and freedoms in Kyrgyzstan. Maintaining the balance between the declared goals of digitalisation and ensuring fundamental human rights remains the key challenge for the country.

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