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2 TO:  
3 Directorate-General for Communications Networks, Content and Technology  
4 European Commission  
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6  
7 **2nd Data Package – COM(2017) 495 final – 2017/0228 (COD)**  
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9  
10 First of all, a lot of thanks to Directorate-General for Communications Networks, Content and  
11 Technology for organising this important consultation.  
12

13 This opinion represents an opinion of an individual citizen, not any legal entity.  
14

15 This opinion does not contain:

- 16 – any business secrets
- 17 – any trade secrets
- 18 – any confidential information.

19  
20 This opinion is public.  
21 PDF file of this opinion can be added to a relevant web page.  
22

23  
24 Annex 1 holds information about previous consultations at the European Union level.

25 Annex 2 holds information about disclaimers and copyright.  
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29 Best Regards,  
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33 Jukka S. Rannila  
34 citizen of Finland  
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36 signed electronically  
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39 [Continues on the next page]  
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**About previous consultations and opinions**

Annex 1 holds information about previous consultations and my previous opinions.

Here we can note that I have repeated the same issues based on previous consultations. Different units of the European Commission already know something about my previous opinions

**Note: Previously I have sent opinions to some units of the Directorate-General for Communications Networks, Content and Technology.**

**Article 7 / Single points of contact  
(2nd Data Package – COM(2017) 495 final – 2017/0228 COD)**

I have only on issue based on the proposed legislation. I handle only Article 7 of the proposed legislation.

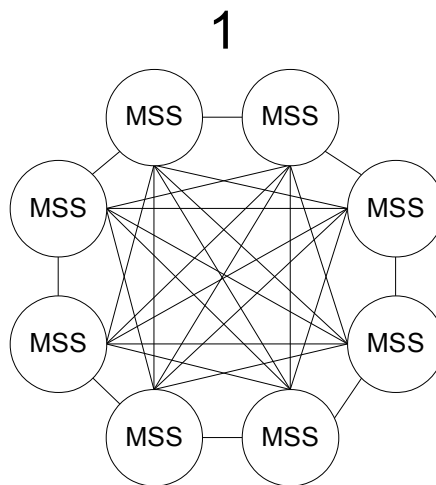
**Each Member State shall designate a single point of contact**

**Note: I have proposed several times a single point of contact for each member state.**

**Opinion: A single point of contact for each Member State can be supported.**

**Complexity at the European Union level**

I have noted several times that different member state systems (MSS) can interlinked in many ways. This means that co-operation with European Union systems means a lot of work. This leads to the question of a European Contact Point (EUCP) for different member state systems (MSS).



**MSS = Member State System**

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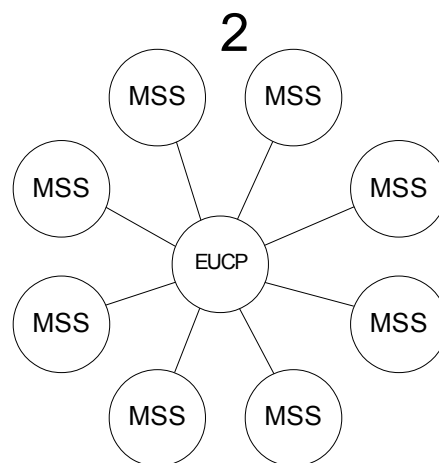
73 There are 28 member states (European Union) at the moment. In reality there are unique situations  
 74 with information systems in different member states. In some cases information systems can be  
 75 implemented based on complex system-to-system connections. Complex system-to-system  
 76 connections means a lot of work when there are changes in some systems.

77  
 78 Here we can calculate connections based on number of information systems.

- 79
- 80 1 x 28 member state systems = 28 systems
- 81 5 x 28 member state systems = 140 systems
- 82 10 x 28 member state systems = 280 systems
- 83 15 x 28 member state systems = 420 systems
- 84 20 x 28 member state systems = 560 systems.
- 85 28 x 30 member state systems = 840 systems

86  
 87 **Proposal: Complex system-to-system connections implemented in information systems**  
 88 **could be assessed carefully.**

89



**MSS = Member State System**  
**EUCP = European Contact Point**

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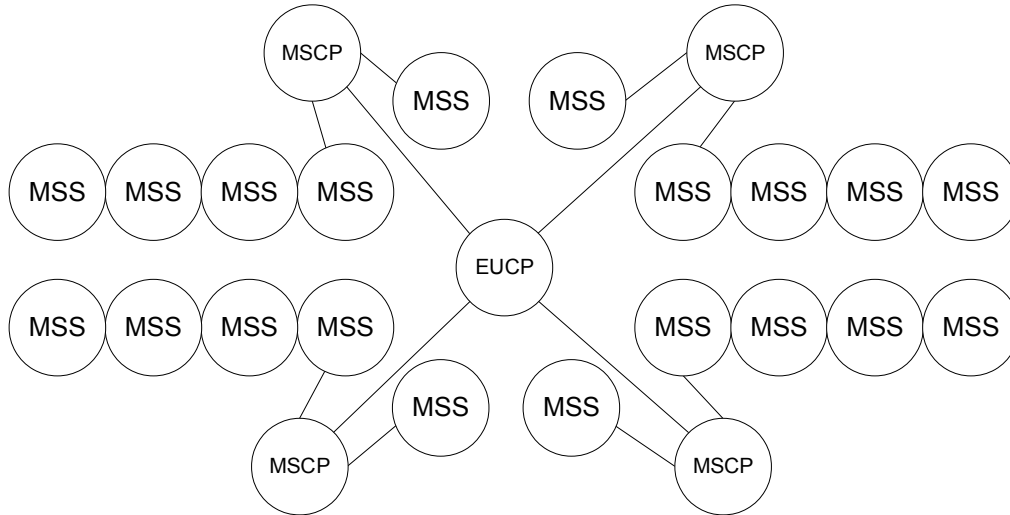
92

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94 Naturally there could be direct contacts between different member state systems (MSS) and  
 95 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large  
 96 number of different member state system. Based on 28 member state systems there could be  
 97 hundreds of connections. One option is to have a single European contact point for member state  
 98 systems. Here we can note that there can be hierarchy between different system (EU ↔ member  
 99 states) and there can be member state contact points (MCP). Then there can be some hierarchy  
 100 between different systems. (European Union ↔ EUCP ↔ MSCP ↔ MSS ↔ Member State). There  
 101 are unique situations with member statesystems in member states. Therefore member state contact  
 102 points (MCP) can reduce the complexity with European Union contact point (EUCP).

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**MSS = Member State System, MSCP = Member State Contact Point,  
EUCP = European Contact Point**

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Based on those calculations there could be a lot of direct connections to the European contact point. Number of those connections can be overwhelming. The situation between member states can vary in many ways. So there can be different and unique systems between member states.

I have proposed several times creation of member state contact points which could handle different system-to-system connections on member state level. Then it can be easier to create connections between member state contact points and European contact point.

**Proposal: There could be one information system (member state contact point, MSCP) on member state level.**

**Proposal: Different member state systems could be consolidated based on limited number system-to-system connections (MSCP ↔ MSS).**

**Proposal: One information system (member state contact point, MSCP) on member state level could handle system-to-system connections at the European Union level (European contact point) (EUCP ↔ MSCP).**

**Proposal: There could be some serious work for developing a standardised member state contact points (MSCP).**

**Proposal: After developing a standardised member state contact point (MSCP) different member states could consolidate their systems (MSCP ↔ MSS).**

**Proposal: European Union contact point (EUCP) and member state contact points**

133 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at the European**  
134 **Union level.**

135  
136 Naturally we have to note that developing a standardised member state contact point (MSCP) means  
137 more work. On the other hand a standardised member state contact point (MSCP) could handle  
138 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member  
139 states may have more systems than other member states. We have to note that there are different  
140 systems based on several technological solutions.

141  
142 **Summary – Clause 1 of Article 7:**

143 “Each Member State shall designate a single point of contact who shall liaise with the  
144 single points of contact of other Member States and the Commission regarding the  
145 application of this Regulation. Member States shall notify to the Commission the  
146 designated single points of contact and any subsequent change thereto.”

147  
148 **Proposal: There could be a single point of contact for each Member State (MSCP).**

149  
150 **Proposal: However there should not be complex many-to-many system connections**  
151 **between different member state systems (MSS ↔ MSS).**

152  
153 **Proposal: Cooperation between different Member State (MSCP) could be facilitated**  
154 **with one European Union contact point (EUCP).**

155  
156 **Proposal: There could be some standardisation for Member State Contact Points**  
157 **(MSCP) and European Union contact point (EUCP).**

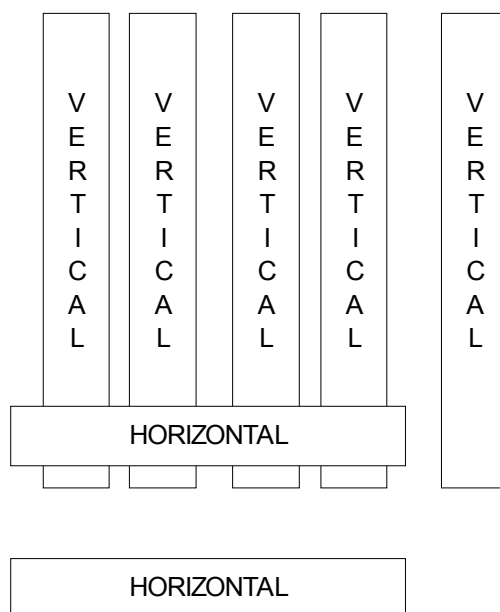
158  
159 Like said before complex many-to-many connections mean a lot of work for different stakeholders.  
160 Different contact points (MSCP and EUCP) mean less work for different stakeholders.

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162 **About different standards**

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164 I have proposed several times to use *open horizontal standards* when developing different  
165 information systems.

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167 **Favouring open standards / Favouring horizontal standards**

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170 [Continues on the next page]



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173 There are differences between horizontal and vertical standards. A simple example is naturally  
174 email solutions. There are several vertical standards when creating technically email solutions. Then  
175 there are horizontal standards which enable sending messages between technically different email  
176 solutions.

177

178 **Proposal: There could be assessment of vertical and horizontal standards.**

179

180 **Proposal: Using horizontal standards could be favoured when creating different  
181 information systems on the European Union level.**

182

183 Horizontal standards enables technological solutions which can work together. Horizontal standards  
184 hides different complexities in information systems.

185

186 **Opinion: The number of redundant standardisation efforts should be minimal.**

187

188 **Proposal: There could be separation of horizontal standards and vertical standards.**

189

190 **Proposal: There could be different standardisation efforts to horizontal standards and  
191 vertical standards.**

192

193 Personally I have advocated using different horizontal standards. For example email standards  
194 (horizontal) are implemented with very different technologies (vertical).

195

196 Here we can note some problems:

197

198

- 199 • some systems are based on **de-facto** standards
- 200 • some systems are based on **de-jure** standards
- 201 • there can be confrontations between **de-facto** and **de-jure** standards
- 202 • there can be a monopoly situation in some domain
- 203 • some standards may inhibit possible actions of some stakeholders
- 204 • there can be a standard war on some domains
- 205 • standards have different life-cycles
- 206 • systems have different life-cycles
- 207 • there can be mismatches between different life-cycles
- 208 • there can be failed standards
- 209 • there can be deprecated standards.

210

211 It is quite normal situation in the information technology field that there are competing standards  
212 for some application field. Therefore there are all the time ongoing “standards wars” or “format  
213 wars”. The information technology standards tend to be interrelated and one “standards war” or  
214 “format war” can lead to another similar situation.

215

216 I have advocated open standards even though in some cases open standards are not de facto  
217 standards. In practice public sector has very important role, when some standards are competing in  
218 the market place. Because public sector has a considerable power when buying/developing  
219 information systems and therefore public sector can sometimes direct markets to certain standards.  
220 Therefore there should be serious vigilance when assessing different standards and “standards” in  
221 some application fields.

222

223 There are different standards setting organisations on the information technology field. One list <sup>1</sup> of  
224 these standards setting organisations is provided by ConsortiumInfo.org.

225

226 One warning can be said about standards setting organisations. All standards setting organisations  
227 are not successes based on several factors and there can may irrelevant standards setting  
228 organisations. Market situation on different vehicle markets varies a lot based on different factors.

229

230 **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**  
231 **different standard setting organisations could be assessed carefully.**

232

233 Personally I have advocated using different horizontal standards. For example email standards  
234 (horizontal) are implemented with very different technologies (vertical).

235

236 **Proposal: Governments should especially concentrate on horizontal standards.**

237

238 **Proposal: Some government agencies could apply for memberships of different**  
239 **standard setting organisations which develop especially horizontal standards.**

240

241 **Proposal: Government agencies should not be passive by-standers when different**  
242 **horizontal standards are developed.**

1 Standard Setting Organizations and Standards List, [www.consortiuminfo.org/links/linksall.php](http://www.consortiuminfo.org/links/linksall.php)

243

244

**Proposal: Government agencies could financially support development of horizontal standards.**

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**Proposal: There could some guidance for using open horizontal standards on different application fields.**

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249

**Needs for standardisation?**

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After this consultation there could be some serious work for assessing different needs for standardisation. I have advocated open horizontal standards when giving opinions to different stakeholders.

255

**More technical consultations?**

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Based on answers (consultation generally) there could be more technically oriented consultations. Previously mentioned issues (this opinion) could be detailed for new technically oriented consultations.

261

262

**Proposal: More technically oriented consultations could be organised after this consultation.**

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264

**An example for cooperation: Web feeds (RSS and Atom)**

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I have advocated usage of web feeds<sup>2</sup> on several previous opinion documents. Actually there are two standards for web feeds: RSS<sup>3 4</sup> and Atom<sup>5 6 7</sup>.

271

272

**Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different informations systems (EU / Member states).**

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274

275

**Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-time) information for different stakeholder(s) (communities).**

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277

278

**Proposal: There can be different web feeds (RSS and/or Atom) for different stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**

279

2 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed)

3 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

4 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

5 [https://en.wikipedia.org/wiki/Atom\\_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

6 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

7 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol



280 **solution.**

281

282 **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

283

284 It can be easier to create web feeds in different information systems since web feeds enable  
285 connections without direct system-to-system connections.

286

287 It can be noted, that different back-office systems (with a wide variety of different technologies) can  
288 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this  
289 kind solutions front-office systems dont need direct system-to-system communications with back-  
290 office systems.

291

292 **Good luck!!!**

293

294 This opinion is quite limited. Hopefully there are other constructive ideas presented in other  
295 opinions. This remains to be seen.

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299 [Continues on the next page]

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**ANNEX 1**

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302 My opinions to the previous and relevant consultations – there consultations were mostly organised  
303 by the European Commission. General page to all consultations – both in English and in Finnish:

304 <http://www.jukkarannila.fi/lausunnot.html>

305

306

307 My opinions to the previous and relevant consultations – there consultations were mostly organised  
308 by the European Commission.

309

310 EN: Opinion 1: Review of the rules on access to documents

311 [http://www.jukkarannila.fi/lausunnot.html#nro\\_1](http://www.jukkarannila.fi/lausunnot.html#nro_1)

312

313 EN: Opinion 2: Schools for the 21st Century

314 [http://www.jukkarannila.fi/lausunnot.html#nro\\_2](http://www.jukkarannila.fi/lausunnot.html#nro_2)

315

316 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for  
317 Safe and Innovative medicines

318 [http://www.jukkarannila.fi/lausunnot.html#nro\\_3](http://www.jukkarannila.fi/lausunnot.html#nro_3)

319

320 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

321 [http://www.jukkarannila.fi/lausunnot.html#nro\\_5](http://www.jukkarannila.fi/lausunnot.html#nro_5)

322

323 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

324 [http://www.jukkarannila.fi/lausunnot.html#nro\\_6](http://www.jukkarannila.fi/lausunnot.html#nro_6)

325

326 EN: Opinion 8: European Interoperability Framework, version 2, draft

327 [http://www.jukkarannila.fi/lausunnot.html#nro\\_8](http://www.jukkarannila.fi/lausunnot.html#nro_8)

328

329 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS  
330 proposal for comments

331 [http://www.jukkarannila.fi/lausunnot.html#nro\\_9](http://www.jukkarannila.fi/lausunnot.html#nro_9)

332

333 EN: Opinion 15: Collective Redress

334 [http://www.jukkarannila.fi/lausunnot.html#nro\\_15](http://www.jukkarannila.fi/lausunnot.html#nro_15)

335

336 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

337 [http://www.jukkarannila.fi/lausunnot.html#nro\\_17](http://www.jukkarannila.fi/lausunnot.html#nro_17)

338

339 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

340 [http://www.jukkarannila.fi/lausunnot.html#nro\\_18](http://www.jukkarannila.fi/lausunnot.html#nro_18)

341

342 EN: Opinion 19: Official Acknowledgement by the Commission

343 [http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)

344

- 345 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
346 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
347
- 348 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
349 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
350
- 351 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
352 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
353
- 354 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
355 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
356
- 357 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
358 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
359
- 360 EN: Opinion 30: Internet Filtering  
361 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
362 NOTE: Organised by the European Committee for Standardization (CEN) <sup>8</sup>  
363
- 364 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
365 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
366
- 367 EN: Opinion 34: REMIT Registration Format  
368 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
369 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>9</sup>  
370
- 371 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
372 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
373
- 374 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
375 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
376
- 377 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
378 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
379
- 380 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
381 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
382
- 383 EN: Opinion 41: AT.39398: observations on the proposed commitments  
384 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
385
- 386 EN: Opinion 42: Opening up Education  
387 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)

<sup>8</sup> <http://www.cen.eu/> (Accessed 2 July 2012)

<sup>9</sup> <http://www.acer.europa.eu/> (Accessed 2 July 2012)

388  
389 EN: Opinion 43: Publication of extracts of the European register of market participants  
390 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
391 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
392  
393 EN: Opinion 44: Evaluation policy guidelines  
394 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
395  
396 EN: Opinion 45: About ICT standardisation  
397 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
398  
399 EN: Opinion 46: Review of the EU copyright rules  
400 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
401  
402 EN: Opinion 51: European Area of Skills and Qualifications  
403 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
404  
405 EN: Opinion 52: Trusted Cloud Europe Survey  
406 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
407  
408 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
409 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
410 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
411  
412 EN: Opinion 55: European Energy Regulation  
413 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
414 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
415  
416 EN: Opinion 59: Green paper on mobile Health  
417 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
418  
419 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
420 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
421  
422 EN: Opinion 61: European Register of Products Containing Nanomaterials  
423 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
424  
425 EN: Opinion 64: Corporate Social Responsibility - European Commission  
426 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
427  
428 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
429 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
430  
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- 433 EN: Opinion 68: European Network Code Stakeholder Committees  
434 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
435 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
436  
437 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
438 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
439 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
440  
441 EN: Opinion 74: Enabling the Internet of Things  
442 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
443 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) <sup>10</sup>  
444  
445 EN: Opinion 80: Mandatory Transparency Register  
446 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
447  
448 EN: Opinion 84: Revision of the European Interoperability Framework  
449 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
450  
451 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
452 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
453  
454 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
455 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
456  
457 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
458 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
459 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
460  
461 EN: Opinion 93: Safety of apps and other non-embedded software  
462 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
463  
464 EN: Opinion 95: Targeted consultation on eForms  
465 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
466  
467 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)  
468 [http://www.jukkarannila.fi/lausunnot.html#nro\\_97](http://www.jukkarannila.fi/lausunnot.html#nro_97)  
469  
470 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals  
471 [http://www.jukkarannila.fi/lausunnot.html#nro\\_98](http://www.jukkarannila.fi/lausunnot.html#nro_98)  
472  
473 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy  
474 Regulators. Recast  
475 [http://www.jukkarannila.fi/lausunnot.html#nro\\_99](http://www.jukkarannila.fi/lausunnot.html#nro_99)  
476

<sup>10</sup> <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 477 EN: Opinion 100: Protection of personal data (EU)  
478 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)  
479
- 480 EN: Opinion 101: Governance of the Energy Union  
481 [http://www.jukkarannila.fi/lausunnot.html#nro\\_101](http://www.jukkarannila.fi/lausunnot.html#nro_101)  
482
- 483 EN: Opinion 102: Smart Wearables  
484 [http://www.jukkarannila.fi/lausunnot.html#nro\\_102](http://www.jukkarannila.fi/lausunnot.html#nro_102)  
485
- 486 EN: Opinion 106: Review of the European Union Agency for Network and Information Security  
487 (ENISA)  
488 [http://www.jukkarannila.fi/lausunnot.html#nro\\_106](http://www.jukkarannila.fi/lausunnot.html#nro_106)  
489
- 490 EN: Opinion 108: Single Digital Gateway  
491 [http://www.jukkarannila.fi/lausunnot.html#nro\\_108](http://www.jukkarannila.fi/lausunnot.html#nro_108)  
492
- 493 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code  
494 [http://www.jukkarannila.fi/lausunnot.html#nro\\_110](http://www.jukkarannila.fi/lausunnot.html#nro_110)  
495
- 496 EN: Opinion 111: Interoperability of information systems for migration and security  
497 [http://www.jukkarannila.fi/lausunnot.html#nro\\_111](http://www.jukkarannila.fi/lausunnot.html#nro_111)  
498
- 499 EN: Opinion 113: Transform of health and care  
500 [http://www.jukkarannila.fi/lausunnot.html#nro\\_113](http://www.jukkarannila.fi/lausunnot.html#nro_113)  
501
- 502 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the  
503 Internet  
504 [http://www.jukkarannila.fi/lausunnot.html#nro\\_114](http://www.jukkarannila.fi/lausunnot.html#nro_114)  
505 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
506
- 507 EN: Opinion 118: Fake news and online disinformation  
508 [http://www.jukkarannila.fi/lausunnot.html#nro\\_118](http://www.jukkarannila.fi/lausunnot.html#nro_118)  
509
- 510 EN: Opinion 119: European Social Security Number  
511 [http://www.jukkarannila.fi/lausunnot.html#nro\\_119](http://www.jukkarannila.fi/lausunnot.html#nro_119)  
512
- 513 EN: Opinion 120: European Labour Authority  
514 [http://www.jukkarannila.fi/lausunnot.html#nro\\_120](http://www.jukkarannila.fi/lausunnot.html#nro_120)  
515  
516
- 517 My opinions to the previous and relevant consultations – there consultations were mostly organised  
518 by the European Commission. General page to all consultations – both in English and in Finnish:  
519 <http://www.jukkarannila.fi/lausunnot.html>

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