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ANSWERS TO CAMSS PROPOSAL FOR COMMENTS
(CAMSS: Common Assessment Method for Standards and Specifications)

Once again I thank the European Commission about a public consultation. Of course it can be said that this consultation will add more transparency to the IDABC unit.

Just to remind about Transparency Initiative [1] there are web pages to have more information about Transparency Initiative.

Annex 1 holds information of copyright, licence and disclaimer.

Best Regards,

Jukka Rannila
citizen of Finland

signed electronically

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1   Transparency Initiative: http://ec.europa.eu/transparency/index_en.htm

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GENERAL REMARKS

It would be stupid to say that there has not been thought processes when creating CAMSS proposal for comments.

This opinion is quite limited and is quite sporadic.

So this opinion is not meant to be a coherent answer based on work done for several weeks.


ABOUT STANDARDS IN THE INFORMATION TECHNOLOGY FIELD

As an idea information technology is quite simple. I have used following points to describe information technology systems:
- document, database or combination of document and database
- add data
- retrieve data
- change data
- remove data
- communications protocols of sending data to remote place
- communications protocols of retrieving data from remote place
- users classified to different classes
- administrator of the systems(s).

There is tendency to hide this simplicity of information technology when there is discussion and quarrel about programming languages, communications protocols, data format protocols, ownership of programs, licences, etc. etc.

The result of this discussion and quarrel is that information technology field is divided to many competing collections of persons and legal entities, i.e. companies, joint ventures, foundations and associations, etc.

The problem for public sector is clear. Public sector units have an obligation to sustain certain activities as long as there is legislative foundation to have this activities. This means that in that public sector unit might be in use certain information system after the originating company for that information technology system might be disappeared.

Therefore open standards and open specifications is a clear obligation when developing information systems for public sector units.

STANDARDS WARS / FORMAT WARS, ROLE OF THE PUBLIC SECTOR

It is quite normal situation in the information technology field that there is competing standards. Therefore there is all the time ongoing "standards wars" or "format wars". The information

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technology standards tend to be interrelated and one "standards war" or "format war" can lead to another similar situation.

In practice public sector have very important role when some standards are competing in the market place. Because public sector has a considerable buying power due to its size it can sometimes direct markets to certain standard.

On the other hand public sector have to stick to certain procurement regulations even though there might be pressure from the commercial market. Therefore there is clear need for assessment methods like CAMMS.


IS IT SELF-EXPLANATORY?

Previous thoughts might have been self-explanatory. In reality there is sometimes very vague understanding about information technology standards and assessment of those standards.

Now we can go through different chapters of the CAMMS proposal.


BASIC IDEAS IN INFORMATION TECHNOLOGY

Previously I mentioned certain basic principles in the information technology systems. Following figure is a simple presentation in other form.
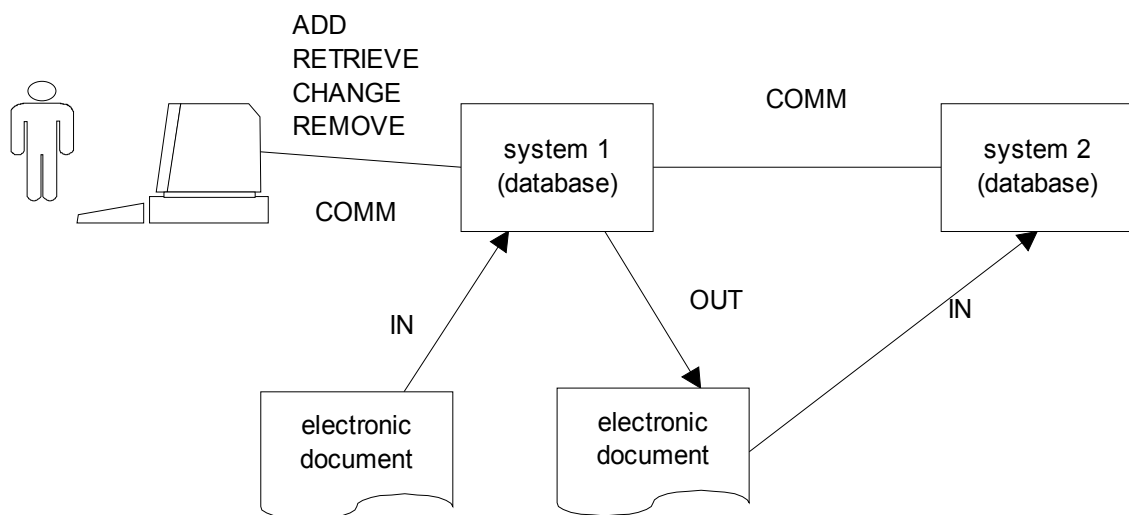


Like I previously mentioned that there is two main ways to handle data, either a document or a database. It can be quite safely said that almost every serious system has a database. In some cases of course system is totally committed to handling electronic documents.


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There can following standards:
- – electronic document to add data to a system
- – electronic document to extract data from a system
- – communication method with user device
- – communication method with other system(s)
- – device for using system
- – it is possible add, retrieve, change and remove data from a system with a device or devices.

Like said before there is tendency to hide this simplicity to the standards jungle.


SUITABILITY OF A STANDARD OR A SPECIFICATION

Like in the previous picture there is certain possibilities for a standard. Therefore first questions are following:
- – is it a electronic document standard?
- – is it a database standard?
- – is it a communications standard?
- – is it a device standard?

There are different aspects of suitability in different standards.

I challenge CAMSS project personnel to think difference with these different standards classes and assessment of standards in those classes.


SUITABILITY / CHANGE IN THE USAGE

Then there is one important aspect which is in the previous picture. When looked carefully there is a image of a person in the left side of the picture.

One aspect of the suitability for a standard is the level of change to the usage of the real system.

It might sound stupid to say this but in many cases implementing a standard means change in the actual usage of the system.

Therefore there have to be some considerations about the change in the actual usage of the system. Like most of the audience knows change in the actual usage of information system can last months. Therefore there have to bee good reasons to implement a standard in a information system.

To my mind there should be a clear assessment if implementation of a standard will mean change in the actual usage.


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POTENTIAL OF A STANDARD OR A SPECIFICATION

To this section I did not find anything to add.

This does not mean that these is no need to continuously think possible modifications to assessment questions about potential of a standard or a specification.


OPENNESS OF A STANDARD OR A SPECIFICATION

In openness point 6.2. there is mentioned that the standard/specification organisation should be open to individuals. This is very important since not all experts are in certain organisation and in some cases an expert might be in the process for individual curiosity or other reasons.

In openness point 6.5. there is mentioned that non-members should have a possibility to participate in the standards creation process. I only note that there is certain limit for efficient committee work and large committees usually do not work. Therefore there should be structured process when there is stages when all interested parties can participate and when there is a limited committee phase. In all cases this process should be fair to all participants.

As a general note I mention that of course there should be clear obligations with formal members of the standard setting organisation and with non-members. In some cases there might be employees in a standard setting organisation and they must have clear roles, if their salaries are paid by formal members of a standard setting organisation .

Without naming the actual companies I always calculate commitment to a standard checking which of the certain companies are presented as formal members of a standard setting organisation. Therefore representation of different competing in a standard setting organisation firms should be calculated.


OPENNESS / VIGILANT CORRUPTION PREVENTION

In some cases dominant interoperability standard might be result of domination of a corrupt monopoly, a corrupt duopoly or a corrupt oligopoly. Therefore public sector should check that it is not intentionally promoting a standard that enforces corruption of a monopoly, a duopoly or a oligopoly.

In a corrupted dominant standard standard situation there should be European-wide actions to alleviate that situation, e.g. antitrust actions.

Therefore in a unclear standard selection situation there should be reports from European competition authorities if favouring certain standard enforces corruption of a monopoly, a duopoly or a oligopoly.


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TECHNICAL INTEROPERABILITY TEST CONDITIONS AND TECHNICAL
INTEROPERABILITY TEST MEETINGS

In the chapter 6 there is many good notes about openness.

I would add to the chapter 6 that there should be technical interoperability test conditions and
technical interoperability test meetings.

In practice technical interoperability test conditions can mean public technical reference libraries to
all parties, certifications about passed interoperability tests, technical interoperability test
laboratories, etc. technical conformity work areas. If there is no way to conform technical
interoperability that should be a clear warning sign.

Technical interoperability test meetings is also one part of the openness of a standard, e.g. testing
days, plug-in-meetings, etc. I would say that the amount and quality of the participants is important
measure for openness. If fierce competitors are represented in meeting and they are showing to
general public interoperability of their products in real use that can be noted as a good sign for open
interoperability standard.

However I stress that there should be also safeguards in corruption prevention if these technical
interoperability test meetings are actually enforcing corruption of a monopoly, a duopoly or a
oligopoly

If there is no practical measures to have actual technical interoperability test conditions this should
be a clear warning sign.


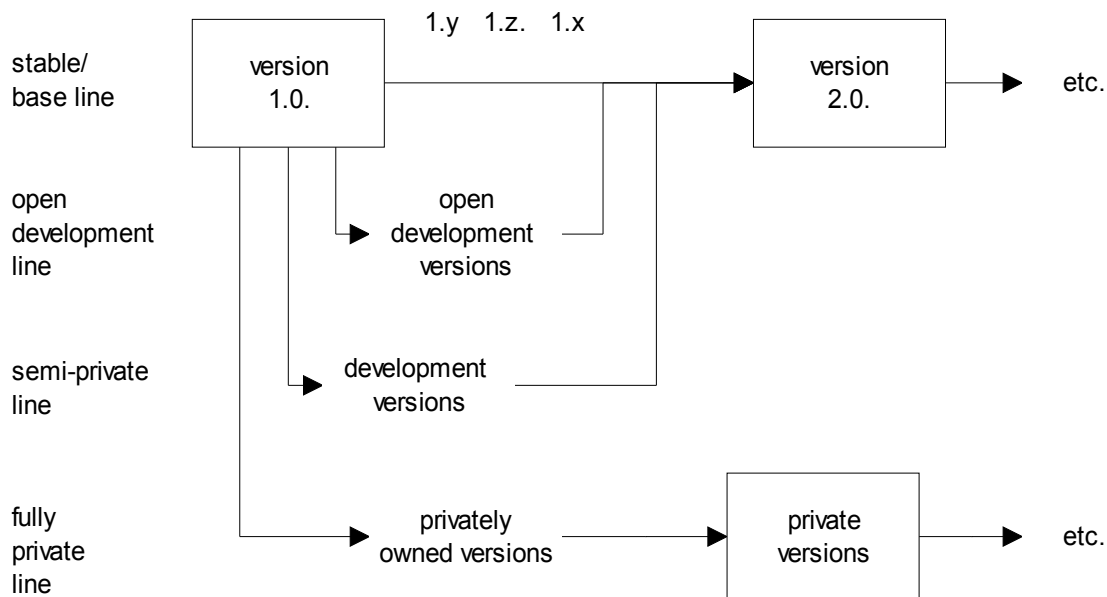OPENNESS / ACTIVATED LEGAL TERMS IN CHANGE OF A STANDARDS SETTING
ORGANISATION

In point 3 about openness there is very good proposal for intellectual property rights.

Most probably someone else have reminded that there is a bunch of (free and) open source software
licences, e.g. GPL, MIT, BSD, etc. etc.

In the case of open source software there should be evaluation about the selected software licence.

Once a again it is nice to have a figure.

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```
                        1.y   1.z.   1.x

stable/        ┌──────────┐              ┌──────────┐
base line      │ version  │──────────────▶│ version  │───▶  etc.
               │   1.0.   │              │   2.0.   │
               └──────────┘              └──────────┘

open                         open
development              ──▶ development ──
line                         versions

semi-private               development
line                   ──▶ versions

fully                      privately        ┌──────────┐
private                ──▶ owned versions ──▶│ private  │───▶  etc.
line                                         │ versions │
                                             └──────────┘
```

It is quite normal that software is developed in phases. In the picture this can be seen as stable/base versions 1.0, 1.y, 1.z, 1.x and 2.0. There are many naming conventions but generally speaking versions between 1.0 and 2.0 are normally small modifications and defect prevention. In general this is the same to commercial and open source software development.

In open development line there are all kinds of development version and generally speaking there are meant for developers and testers. In normal open source software development everybody can create development versions but it is different story to have those modifications to the base/stable line of the software.

In semi-private line an organisation can buy open source software developer time. In some cases an organisation needs some feature very soon and there is possibility to hire an open source software developer for a sub-project. After the feature is created the solution can be released as a open source code to the rest of the open source software development company.

In fully private line an organisation takes an open source software code and starts to modify it and keeps the new versions as a private property.

The last "fully private line" is very fiercely discredited and very ardently opposed by many prominent open source developers and open source software organisations. There has been also some court cases accusing companies using wrongly software that has been licensed with an open source licence even though a company used open source software code like privately owned.

In reality there is always a possibility that certain open source software development community might somehow fade away. In some cases original developers aspirations change to another field. Public sector can not change its aspiration freely and there has to be safeguards for public sector in this case.

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I have been thinking some sort of activated legal terms if the original open source software development community decides to end its functions.

So I guess that there should be some sort of legal agreement between public sector unit and open source software development community.

This leads to a question that can a public sector unit use open source software where its development community is not legally organised around a company, association or foundation.

So I propose that CAMSS project personnel will make assessment if assessing certain IT standards means also assessment of the legal framework of the standard setting organisation.

**In the case of the open source (standard) software there might be some legal problems if the community developing the open source (standard) software decides to end its functions.**

It would be nice to say that open source software is eternal. Of course certain software code can be saved forever but normally it is maintained and developed further in some community. Therefore the quality of the open source (standard) software community is crucial.

When checking commercial counterparts there are mergers, divisions, downsizing, joint ventures, bankrupts,etc. etc. Why would not open source software development community face different changes?

Since public sector is meant to be sustainable there is need to avoid unexpected situations.

In the previous figure there was division of open, semi-private and fully private software development lines. If a community developing certain open source (standard) software ending its functions there should be clear steps if a public sector unit has to move forward with new a) fully open, b) semi-private or c) fully private development model.

This kind of thinking of an organisation ending its functions might be useless in some way.

However it is totally accepted in normal working conditions that an employee might want to have totally new tasks after doing the same for decades. So we can not expect that certain open source (standard) software developers would do the same for decades. In the case of open source (standard) software there is difference to direct employee-employer legal relations.


MARKET CONDITIONS

In one of the previous pictures there is certain possibilities for a standard and questions were following:
  – is it a electronic document standard?
  – is it a database standard?


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- is it a communications standard?
- is it a device standard?

Once again there is differences if comparing market conditions for different standards types. There fore I propose that there should be different standard types.

Lets have some examples:

- different devices might comply with the same communication standard
- different devices might send different electronic documents using the same communication standard
- one system might collect different electronic documents communicated with several different communications standards and communicate them forward to the next system as standardised electronic document
- data from a standardised electronic document can be added to several databases using several different database languages
- etc.

So where is the market place for which standard? Was the communications standard more open than the device standard? How about database standards and sending standardised electronic documents based on the standardised data in non-standardised database? Etc. etc.

Like this small exercise shows information technology field is a big standard jungle with lot of relations.

**<u>So I propose that sometimes there is need to go through the whole standard chain when assessing the market place.</u>**

In reality information technology is very layered and there are several layer models in information technology literature. In IDABC documents there are some presentations of this layer structure.

It is good to check the whole standard chain since a totally non-standard solution might apply with a certain open standard. There might be non-standard and standard layers in different information technology solutions.

Like I earlier proposed that there should vigilant corrupt (monopoly, duopoly, oligopoly) prevention.

If the whole standard chain is not evaluated it can lead to a situation where a corrupt monopoly, a corrupt duopoly or a corrupt oligopoly has its solution "complying" with one open standard and discrediting other non-complying features.

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GOOD LUCK TO EVERYBODY

Thats all folks!

Of course there could be more about this issue but one person has quite limited mind. Therefore I do not pretend that this opinion is complete and final answer for information technology standard assessment.

Hopefully this opinion has triggered some thinking when moving to the next phase in the CAMSS project.

With kind regards,

Jukka Rannila
citizen of Finland

signed electronically

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## **ANNEX 1**

DISCLAIMER

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2   Based on the Finnish three-party system there is phenomenon called extreme-centre in Finland.

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