TO: European Commission

**EU customs procedures – developing and upgrading electronic systems**

First of all, a lot of thanks to European Commission for organising this important consultation.

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

This opinion does not contain:
- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

PDF file of this opinion can be added to a relevant web page.

Annex 1 holds information about previous consultations at the European Union level.
Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

[Continues on the next page]
About previous consultations / Repeating several issues

Annex 1 holds information about previous consultations. I have repeated the same issues several times and previous consultation documents can be assessed critically. Different units of the European Commission already know something about my previous opinions.

Many proposals already implemented

This opinion does not list all possible issues based on previous consultations since several issues are already mentioned on the COMMISSION IMPLEMENTING DECISION (EU) draft (Ref. Ares(2019)6019567 – 27/09/2019).

National systems and trans-European systems

On the page 3 of the draft document is following text:

The work programme should distinguish between the electronic systems that the Member States are to develop themselves (‘national systems’) and those that they are to develop in cooperation with the Commission (‘trans-European systems’).

Here can be noted that there are several issues to be assessed when creating national systems and trans-European systems.

System timeline – national systems

Proposal: Different information systems (EU-wide systems and member state systems) could be assessed based on informations system lifetime.
Start, end, events and lifetime

Information systems contain information about events and states which means different processes during the lifetime of a system. Like mentioned before different systems can be assessed based on lifetime.

Assessing different application programming interface (APIs)

There can be several APIs implemented in different information systems. The natural problem with APIs is timeline of different systems which implement different APIs. There can be new and old systems which implement different APIs.

Proposal: Different information systems (EU-wide systems and member state systems) could be assessed based on implementation of different APIs.

Here can be noted that there can several APIs implemented in different information systems.

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One issue can be different versions of APIs. Based on timelines of different systems there can be different API versions in use.

Proposal: Different API versions could be assessed very carefully.

Based on previous issues it can be noted that in some cases an older system can implement only some versions of different APIs.

About different identifiers (ID)

Developing a standardised member state contact point (MSCP) means some work to be done. Here we can note that there will be several identifiers when developing new systems and maintaining current systems (EUCP ↔ MSCP).

I have proposed several times to use open and public identifiers when developing different information system.

More and more new identifiers (ID)

In previous consultations there has been discussion about different identifiers (ID) in different information systems. It can be noted from the previous opinions that there will be several and different identifiers (ID) for different levels.

Examples of these identifiers (ID) are following:

1) Facebook ID for an individual person
2) Facebook ID for the individual updates of individuals
3) Data Universal Numbering System (D-U-N-S)
4) Reuters instruments codes (RICs)
5) Social security code for individual citizens in the European Union member states
6) Business identity code for a company in an European Union member state
7) Value added tax code for a company in an European Union member state.

The examples of private identifiers (Facebook IDs, Data Universal Numbering System (D-U-N-S), Reuters Instruments Codes (RICs)) show, that persons and/or communities can use or even demand of using identifiers (ID) from privately owned information systems.

Proposal: There could be a systematic review of different identifiers (ID) on different levels.

Proposal: Possible systematic review of different identifiers (ID) should assess different situations.

Different information systems have also internal identifiers (ID) and external identifiers (ID) for

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(possible) public usage. The added value for different stakeholders is provided by combination of different identifiers (ID) in a specific information system.

Proposal: The could be some assessment(s) based on different versions of different identifiers (ID).

It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible, that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers (ID), but this consolidation means some serious technical and administrative actions.

Proposal: Legacy identifiers (ID) could be assessed seriously.

When information about relevant identifiers is collected, there could be a serious assessment of possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier, there may be a need for serious (anti-trust?) negotiations with providers of some identifiers. 

Proposal: The nature of different identifiers (ID) could be assessed.

Proposal: There could be serious negotiations with some providers of identifiers (ID).

In the European Union there has been different anti-trust cases which are related to different private sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

**Horizontal and vertical technologies – generally**
There are differences between horizontal and vertical technologies. A simple example is naturally email solutions. There are several vertical technologies when creating technically email solutions. Then there are horizontal technologies which enable sending messages between technically different email solutions.

Proposal: Horizontal technologies should be favoured when developing different technologies.

Horizontal and vertical software

Software can be developed both vertically and horizontally.

Proposal: Horizontal software should be favoured when developing and/or researching different technologies.

EU-wide 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).

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

Naturally there could be direct contacts between different member state systems (MSS) and European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large number of different member state system. Based on 28 member state systems there could be

MSS = Member State System

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hundreds of connections:

- $28 \times 10 = 280$ MSS ↔ 1 EUCP
- $28 \times 20 = 560$ MSS ↔ 1 EUCP
- $28 \times 30 = 840$ MSS ↔ 1 EUCP

Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations with member state systems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).

Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

In the current situation, European Union member states (and some co-operation states) have their own internal IDs for several information systems. Also, the members states organised as a federation have their own internal problems with state-level IDs.

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 different and unique systems between member states.

On the other hand, there are some working examples of joined or federated EU-wide registers. However, the amount of administration and needed legally binding agreements is considerable.

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

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The solution can be, that member states have own Member State Contact Points (MSCP) and different state level systems are combined gradually. Then the member state system IDs can be used in the European Contact Point (EUCP).

Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations with member state systems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).

Proposal: Different member state systems could be consolidated based on limited number system-to-system connections.

Proposal: There could be some time frames for consolidating different member state systems (MSS) with member state contact points (MSCP).

Proposal: There could be some time frames for consolidating member state contact points (MSCP) with the European Union contact point (EUCP).

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

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

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

Proposal: European Union contact point (EUCP) and member state contact points (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European Union level.

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

Features and requirements in different information systems

![Diagram showing the relationship between number of features and usability](image)

One issue is assessment of different features.

Proposal: Number of different information system features could assessed carefully.

Proposal: There should not be too much features in information systems.

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One issue is number of different requirements. There can be too many requirement changes which mean more work for system developers.

Proposal: Number of requirements could be assessed carefully.

Proposal: All new requirements should be assessed very carefully before implementing different requirements in different information systems.

Possible technical consultations

Proposal: There could be more technical consultations based on results of this consultation.

[Continues on the next page]
An example of more technical consultation could be assessment of different XML formats. One option is distributing information about technical consultations to different information technology expert associations. Naturally there can be different phases (e.g. two phases) for assessing different information technology issues.

**Proposal:** Information about more technical consultations could be distributed for different information technology expert associations.

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

I have advocated usage of web feeds 1 on several previous opinion documents. Actually there are two standards for web feeds: RSS 2 3 and Atom 4 5 6.

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

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

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 solution.

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

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

It can be noted, that different back-office systems (with a wide variety of different technologies) can implement RSS standards, and these RSS feeds can be used in the front-office systems. With this kind solutions front-office systems don’t need direct system-to-system communications with back-office systems.

Good luck!!!

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

[Continues on the next page]

1 https://en.wikipedia.org/wiki/Web_feed
2 http://www.rssboard.org/rss-specification, RSS 2.0 Specification
4 https://en.wikipedia.org/wiki/Atom_(standard), Wikipedia / Atom (standard)

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

http://www.jukkarannila.fi/lausunnot.html

EN: Opinion 1: Review of the rules on access to documents
http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century
http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe - making Europe a Hub for Safe and Innovative medicines
http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft
http://www.jukkarannila.fi/lausunnot.html#nro_8

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress
http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_18

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EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_20

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
http://www.jukkarannila.fi/lausunnot.html#nro_21

EN: Opinion 23: Public consultation on the review of the European Standardisation System
http://www.jukkarannila.fi/lausunnot.html#nro_23

EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
http://www.jukkarannila.fi/lausunnot.html#nro_27

EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
http://www.jukkarannila.fi/lausunnot.html#nro_28

EN: Opinion 30: Internet Filtering
http://www.jukkarannila.fi/lausunnot.html#nro_30

NOTE: Organised by the European Committee for Standardization (CEN) 7

http://www.jukkarannila.fi/lausunnot.html#nro_32

EN: Opinion 34: REMIT Registration Format
http://www.jukkarannila.fi/lausunnot.html#nro_34

NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) 8

EN: Opinion 35: Exploiting the employment potential of the personal and household services
http://www.jukkarannila.fi/lausunnot.html#nro_35

EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
http://www.jukkarannila.fi/lausunnot.html#nro_37

EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
http://www.jukkarannila.fi/lausunnot.html#nro_39

EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
http://www.jukkarannila.fi/lausunnot.html#nro_40

EN: Opinion 41: AT.39398: observations on the proposed commitments
http://www.jukkarannila.fi/lausunnot.html#nro_41


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EN: Opinion 42: Opening up Education
http://www.jukkarannila.fi/lausunnot.html#nro_42

EN: Opinion 43: Publication of extracts of the European register of market participants
http://www.jukkarannila.fi/lausunnot.html#nro_43
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 44: Evaluation policy guidelines
http://www.jukkarannila.fi/lausunnot.html#nro_44

EN: Opinion 45: About ICT standardisation
http://www.jukkarannila.fi/lausunnot.html#nro_45

EN: Opinion 46: Review of the EU copyright rules
http://www.jukkarannila.fi/lausunnot.html#nro_46

EN: Opinion 51: European Area of Skills and Qualifications
http://www.jukkarannila.fi/lausunnot.html#nro_51

EN: Opinion 52: Trusted Cloud Europe Survey
http://www.jukkarannila.fi/lausunnot.html#nro_52

EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
http://www.jukkarannila.fi/lausunnot.html#nro_53
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 55: European Energy Regulation
http://www.jukkarannila.fi/lausunnot.html#nro_55
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 59: Green paper on mobile Health
http://www.jukkarannila.fi/lausunnot.html#nro_59

EN: Opinion 60: Cross-border inheritance tax problems within the EU
http://www.jukkarannila.fi/lausunnot.html#nro_60

EN: Opinion 61: European Register of Products Containing Nanomaterials
http://www.jukkarannila.fi/lausunnot.html#nro_61

EN: Opinion 64: Corporate Social Responsibility - European Commission
http://www.jukkarannila.fi/lausunnot.html#nro_64

http://www.jukkarannila.fi/lausunnot.html#nro_66

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EN: Opinion 68: European Network Code Stakeholder Committees
http://www.jukkarannila.fi/lausunnot.html#nro_68
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 71: Common Schema for the Disclosure of Inside Information
http://www.jukkarannila.fi/lausunnot.html#nro_71
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 74: Enabling the Internet of Things
http://www.jukkarannila.fi/lausunnot.html#nro_74
NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) 9

EN: Opinion 80: Mandatory Transparency Register
http://www.jukkarannila.fi/lausunnot.html#nro_80

EN: Opinion 84: Revision of the European Interoperability Framework
http://www.jukkarannila.fi/lausunnot.html#nro_84

EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
http://www.jukkarannila.fi/lausunnot.html#nro_86

EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
http://www.jukkarannila.fi/lausunnot.html#nro_88

EN: Opinion 89: BEREC Guidelines for net neutrality rules
http://www.jukkarannila.fi/lausunnot.html#nro_89
NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 93: Safety of apps and other non-embedded software
http://www.jukkarannila.fi/lausunnot.html#nro_93

EN: Opinion 95: Targeted consultation on eForms
http://www.jukkarannila.fi/lausunnot.html#nro_95

http://www.jukkarannila.fi/lausunnot.html#nro_97

EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
http://www.jukkarannila.fi/lausunnot.html#nro_98

Regulators. Recast
http://www.jukkarannila.fi/lausunnot.html#nro_99

9 http://www.berec.europa.eu, Body of European Regulators for Electronic Communications (BEREC)

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EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the re-use of public sector information (recast)
http://www.jukkarannila.fi/lausunnot.html#nro_123

EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
http://www.jukkarannila.fi/lausunnot.html#nro_125

EN: Opinion 128: Summertime arrangements
http://www.jukkarannila.fi/lausunnot.html#nro_128

EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
http://www.jukkarannila.fi/lausunnot.html#nro_129

EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
http://www.jukkarannila.fi/lausunnot.html#nro_132

EN: Opinion 133: standard forms for the publication of notices in the field of public procurement ("eForms")
http://www.jukkarannila.fi/lausunnot.html#nro_133

EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by UCC
http://www.jukkarannila.fi/lausunnot.html#nro_134

EN: Opinion 141: Farm Accountancy Data Network
http://www.jukkarannila.fi/lausunnot.html#nro_141

EN: Opinion 142: Horizon Europe (two consultations)
http://www.jukkarannila.fi/lausunnot.html#nro_142

EN: Opinion 144: Digitisation and online access of cultural material and digital preservation (evaluation)
http://www.jukkarannila.fi/lausunnot.html#nro_144

EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
http://www.jukkarannila.fi/lausunnot.html#nro_146

NOTE: Organised by the European Committee for Standardization (CEN)

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