TO:
Unit G.2: Interactive Technologies, Digital for Culture & Education
Directorate-General for Communications Networks, Content and Technology
European Commission

Evaluation of the Recommendation on digitisation and online accessibility of cultural material and digital preservation

First of all, a lot of thanks to Directorate-General for Communications Networks, Content and Technology (Unit G.2) for organising this important consultation.

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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.

Assessing mostly the Europeana system(s) / Many proposals already implemented

This opinion is mostly assessing the Europeana system(s). Europeana system(s) already implement(s) several issues which I have proposed based on previous consultations. Therefore this opinion does not list all issues based on previous consultations.

Assessing different application programming interface (APIS) / System timeline

Europeana system(s) – APIs
https://pro.europeana.eu/resources/apis/

There are several APIs presented on the Europeana APIs site. 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 informations system timelines.

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

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Proposal: There could be some assessments of different member state systems.

Note: Lifetime of different systems varies.
Note: Possibly it is not possible to consolidate all possible systems at the same time.

Proposal: There could be some timetable for consolidating different systems, i.e. cooperation between member states systems and European Union systems.

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

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.

Interoperability between different versions

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One problem is naturally different versions of digital objects.

Proposal: There could be careful assessment of interoperability based on versions of digital objects.

It can be noted that different versions of digital objects may cause problems for interoperability.

One issue for interoperability are different viewpoints.

Proposal: Different viewpoints for assessing interoperability could be evaluated very carefully.

It can be noted that there can be some new viewpoints in the future.

Features and requirements in different information systems

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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.

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

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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.

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

I have advocated usage of web feeds on several previous opinion documents. Actually there are two standards for web feeds: RSS and Atom.

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.

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ANNEX 1

My opinions to the previous and relevant consultations – there 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

My opinions to the previous and relevant consultations were mostly organised by the European Commission.

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)

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

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

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EN: Opinion 100: Protection of personal data (EU)
http://www.jukkarannila.fi/lausunnot.html#nro_100

EN: Opinion 101: Governance of the Energy Union
http://www.jukkarannila.fi/lausunnot.html#nro_101

EN: Opinion 102: Smart Wearables
http://www.jukkarannila.fi/lausunnot.html#nro_102

http://www.jukkarannila.fi/lausunnot.html#nro_106

EN: Opinion 108: Single Digital Gateway
http://www.jukkarannila.fi/lausunnot.html#nro_108

EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
http://www.jukkarannila.fi/lausunnot.html#nro_110

EN: Opinion 111: Interoperability of information systems for migration and security
http://www.jukkarannila.fi/lausunnot.html#nro_111

EN: Opinion 113: Transform of health and care
http://www.jukkarannila.fi/lausunnot.html#nro_113

EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the Internet
http://www.jukkarannila.fi/lausunnot.html#nro_114

NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 118: Fake news and online disinformation
http://www.jukkarannila.fi/lausunnot.html#nro_118

EN: Opinion 119: European Social Security Number
http://www.jukkarannila.fi/lausunnot.html#nro_119

EN: Opinion 120: European Labour Authority
http://www.jukkarannila.fi/lausunnot.html#nro_120

EN: Opinion 121: 2nd Data Package
http://www.jukkarannila.fi/lausunnot.html#nro_121

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EN: Opinion 122: Proposal to create a cybersecurity competence network with a European Cybersecurity Research and Competence Centre
http://www.jukkarannila.fi/lausunnot.html#nro_122

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 ("eForms")
http://www.jukkarannila.fi/lausunnot.html#nro_132

EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
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

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