First of all, a lot of thanks to European Commission 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.

Collecting accountancy data only once

Generally speaking information should be added only once for some central system.

Proposal: ALL data should be added only once in some (central information) system.

The same information can be asked several times which means more work for reporting different issues.

EU-wide level?

I have noted several times that different member state systems (MSS) can be 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 mean 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

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number of different member state system. Based on 28 member state systems there could be hundreds of connections:

\[
\begin{align*}
28 \times 10 &= 280 \text{ MSS} \leftrightarrow 1 \text{ EUCP} \\
28 \times 20 &= 560 \text{ MSS} \leftrightarrow 1 \text{ EUCP} \\
28 \times 30 &= 840 \text{ MSS} \leftrightarrow 1 \text{ EUCP} \\
\end{align*}
\]

Here we can note that there can be hierarchy between different systems (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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MSS = Member State System, EUCP = European Contact Point

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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 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.

Consolidation based on system lifetime

Here can be noted that every system have some lifetime. During lifetime there can be several processes which mean documenting events and states.

Proposal: One issue for consolidation of information systems is lifetime of systems.

Proposal: Lifetime of different systems could be assessed carefully.

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Features and requirements in different information systems

One issue is assessment of different features.

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

Proposal: There should not be too many 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.

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.
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.

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]

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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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ANNEX 1

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

My opinions to the previous and relevant consultations – these 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)

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)

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

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

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146  EN: Opinion 100: Protection of personal data (EU)
147  http://www.jukkarannila.fi/lausunnot.html#nro_100
148
149  EN: Opinion 101: Governance of the Energy Union
150  http://www.jukkarannila.fi/lausunnot.html#nro_101
151
152  EN: Opinion 102: Smart Wearables
153  http://www.jukkarannila.fi/lausunnot.html#nro_102
154
156  (ENISA)
157  http://www.jukkarannila.fi/lausunnot.html#nro_106
158
159  EN: Opinion 108: Single Digital Gateway
160  http://www.jukkarannila.fi/lausunnot.html#nro_108
161
162  EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
163  http://www.jukkarannila.fi/lausunnot.html#nro_110
164
165  EN: Opinion 111: Interoperability of information systems for migration and security
166  http://www.jukkarannila.fi/lausunnot.html#nro_111
167
168  EN: Opinion 113: Transform of health and care
169  http://www.jukkarannila.fi/lausunnot.html#nro_113
170
171  EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
172  Internet
173  http://www.jukkarannila.fi/lausunnot.html#nro_114
174
175  NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
176
177  EN: Opinion 118: Fake news and online disininformation
178  http://www.jukkarannila.fi/lausunnot.html#nro_118
179
180  EN: Opinion 119: European Social Security Number
181  http://www.jukkarannila.fi/lausunnot.html#nro_119
182
183  EN: Opinion 120: European Labour Authority
184  http://www.jukkarannila.fi/lausunnot.html#nro_120
185
186  EN: Opinion 121: 2nd Data Package
187  http://www.jukkarannila.fi/lausunnot.html#nro_121
188

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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
(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

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ANNEX 2

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