TO:
Unit E.2: Cloud & Software
Directorate-General for Communications Networks, Content and Technology
European Commission


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

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- 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

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Previous 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.

This consultation

On roadmap (Ref. Ares(2019)867420 – 13/02/2019) document (page 2) is following text:

In this regard, the objective of the present initiative is to provide the businesses with clarity and understanding of the Free flow of non-personal data regulation.

Here I note that clarity and understanding of the Free flow of non-personal data regulation means assessing different standards.

About different standards

I have proposed several times usage of open horizontal standards when developing different information systems.

Favouring open standards / Favouring horizontal standards

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

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

Proposal: Using horizontal standards could be favoured when creating different information systems at the European Union level.

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

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

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

Proposal: There could be different standardisation efforts to horizontal standards and vertical standards

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

Here we can note that different national details can be vertical standards.

Proposal: Different (vertical) national details (standards) should not hinder usage of (European) other standards (horizontal).

Here we can note some problems:

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

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

There are different standards setting organisations on the information technology field. One list of these standards setting organisations is provided by ConsortiumInfo.org.

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

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

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

Proposal: Governments should especially concentrate on horizontal standards.

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

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


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

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

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

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.

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

1 x 28 member state systems = 28 systems
5 x 28 member state systems = 140 systems
10 x 28 member state systems = 280 systems
15 x 28 member state systems = 420 systems
20 x 28 member state systems = 560 systems.
28 x 30 member state systems = 840 systems

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

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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 hundreds of connections. One option is to have a single European contact point for member state systems. 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, (European Union ↔ EUCP ↔ MSCP ↔ MSS ↔ Member State). There are unique situations with member statesystems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).
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.

I have proposed several times creation of member state contact points which could handle different system-to-system connections at 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) at 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) at 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 (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at 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.

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)

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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 (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.

Organising more technical consultations?

Proposal: Directorate-General for Communications Networks, Content and Technology could organise more technically oriented consultations based on results of this consultations.

Some possible issues for new consultations could be following:

* identifiers at different levels (member state, European Union, global)
* database structures
* assessment of different standards – open and closed
* technical consultation about usable technologies.

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

I have advocated usage of web feeds \(^2\) on several previous opinion documents. Actually there are two standards for web feeds: RSS \(^3\)\(^4\) and Atom \(^5\)\(^6\)\(^7\).

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.

\(^2\) 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), Wikipedia / Atom (standard)

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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.

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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

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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
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EN: Opinion 55: European Energy Regulation
http://www.jukkarannila.fi/lausunnot.html#nro_55
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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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473
EN: Opinion 68: European Network Code Stakeholder Committees
474 http://www.jukkarannila.fi/lausunnot.html#nro_68
475 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
476
478 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
479 http://www.jukkarannila.fi/lausunnot.html#nro_71
480 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
481
482 EN: Opinion 74: Enabling the Internet of Things
483 http://www.jukkarannila.fi/lausunnot.html#nro_74
484 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
485
486 EN: Opinion 80: Mandatory Transparency Register
487 http://www.jukkarannila.fi/lausunnot.html#nro_80
488
489 EN: Opinion 84: Revision of the European Interoperability Framework
490 http://www.jukkarannila.fi/lausunnot.html#nro_84
491
492 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
493 http://www.jukkarannila.fi/lausunnot.html#nro_86
494
495 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
496 http://www.jukkarannila.fi/lausunnot.html#nro_88
497
498 EN: Opinion 89: BEREC Guidelines for net neutrality rules
499 http://www.jukkarannila.fi/lausunnot.html#nro_89
500 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
501
502 EN: Opinion 93: Safety of apps and other non-embedded software
503 http://www.jukkarannila.fi/lausunnot.html#nro_93
504
505 EN: Opinion 95: Targeted consultation on eForms
506 http://www.jukkarannila.fi/lausunnot.html#nro_95
507
509 http://www.jukkarannila.fi/lausunnot.html#nro_97
510
511 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
512 http://www.jukkarannila.fi/lausunnot.html#nro_98
513
515 Regulators. Recast
516 http://www.jukkarannila.fi/lausunnot.html#nro_99
10 http://www.berec.europa.eu, Body of European Regulators for Electronic Communications (BEREC)

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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

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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

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ANNEX 2

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