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TO: GROW-G4@ec.europa.eu

Targeted consultation on eForms – the next generation of public procurement standard forms

First of all, a lot of thanks to Directorate General for Internal Market, Industry, Entrepreneurship and SMEs 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 on 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]

38

39 **The background material is a large collection of important documents**

40

41 Here we can note that the background material is a large collection of important documents. I have
42 not read all documents.

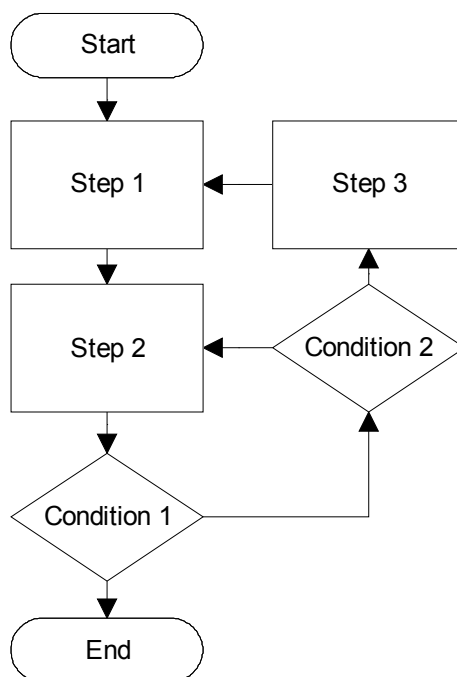
43

44 This document is about process models about public procurement in European Union.

45

46 **A simple presentation of a process**

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50 Here we can note that there can be different processes for public procurement.

51

52 **Proposal(s):**53 **1) The process models for public procurement could be assessed.**54 **2) There can be different process models for different types for public
55 procurement.**

56

57 **Defining some parts of a process – a lot of details (SPEX)**

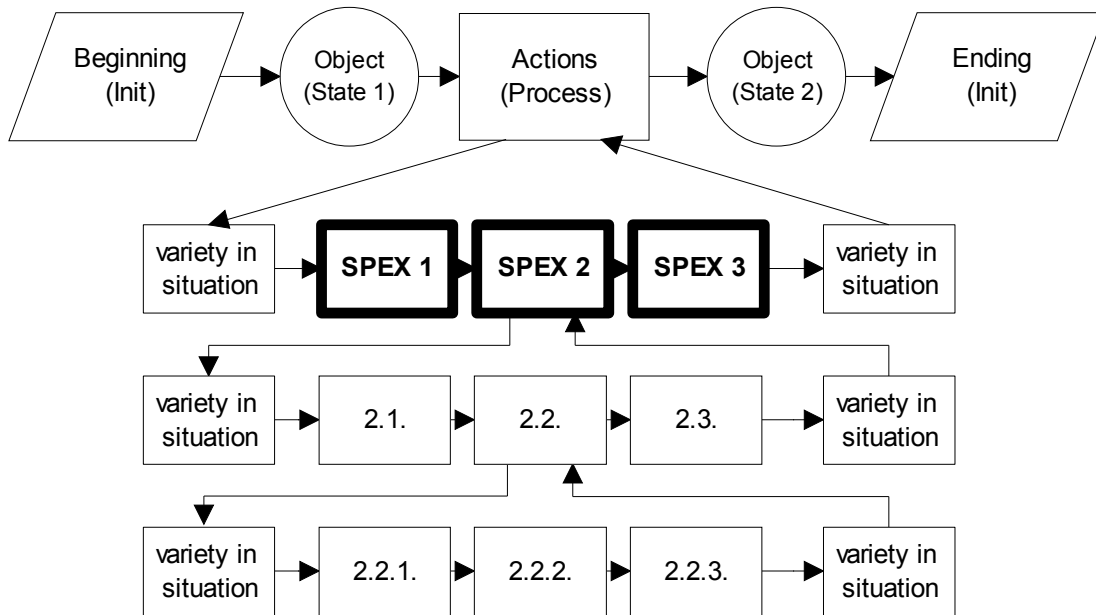
58

59 Following figure notes that some parts of a process can be presented in a detailed way (SPEX).

60

61 Here we can there can be some variety in different situation when implementing some processes.

62

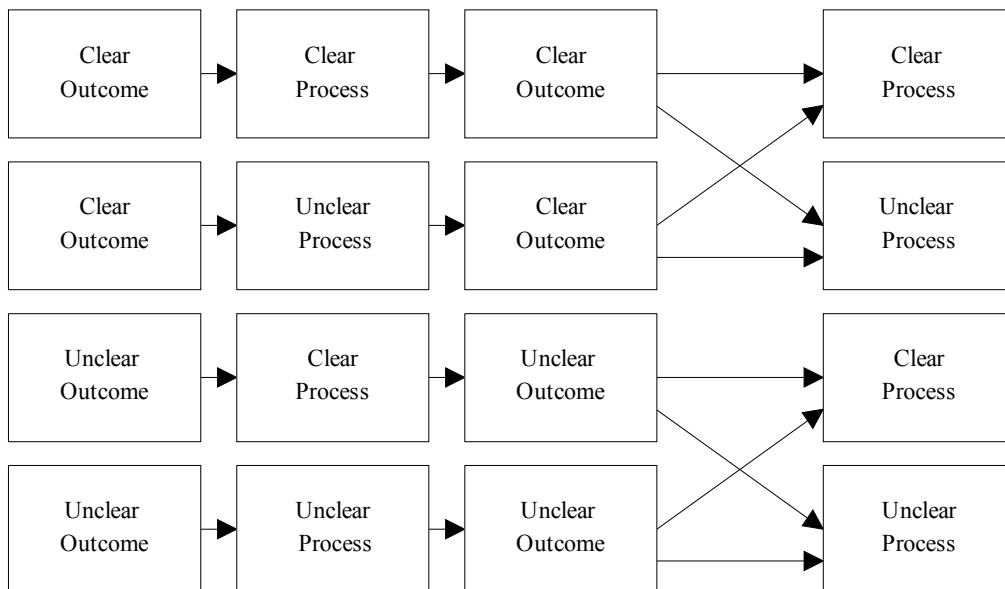


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Proposal(s):

- 3) **There could be some modelling work for processes based on the results of this consultation.**
- 4) **Based on the possible modelling effort there could some very detailed phases (SPEX) for process models.**

Problems with clarity and unclarity when doing some public procurement

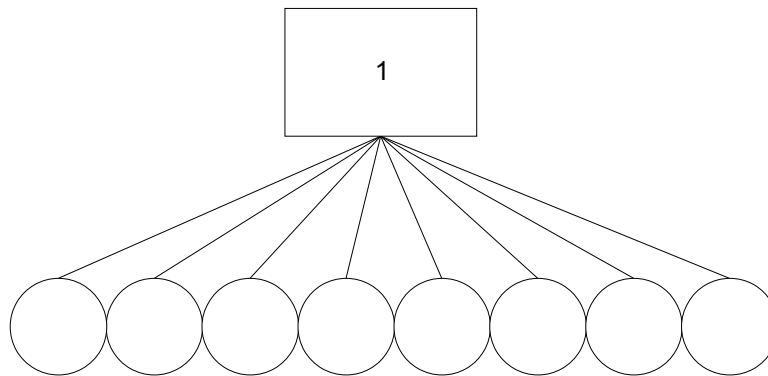


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75 Here we can note that there can be clear and unclear processes when doing some public
76 procurement.

77
78 **The number of different interfaces?**

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82 Here we can note the number of different interfaces for different stakeholder groups.

83

84 **Proposal(s):**

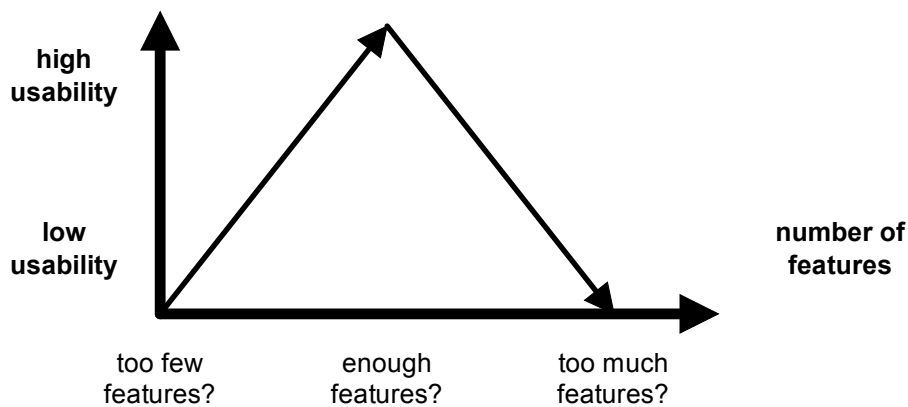
85 **5) Based on the results of this consultation there could be some modelling work for**
86 **different interfaces.**

87 **6) Different stakeholder groups (may) need different interfaces.**

88

89 **Usability of different interfaces?**

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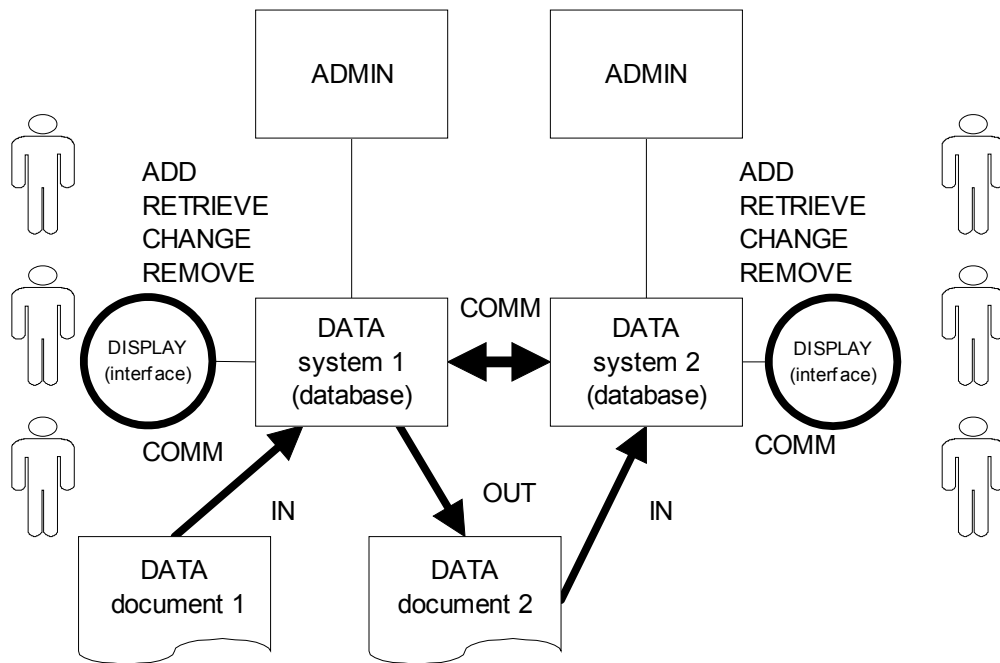
93 Here we can note that there can be usable and non-usable interfaces. Therefore the modelling work
94 for different user interfaces should result simple interfaces which are not complicated.

95

96

- 97 **Proposal(s):**
 98 7) **There could be some modelling for different interfaces.**
 99 8) **Different interfaces for different stakeholder groups should be very usable and**
 100 **very simple.**

102 **System cooperation based on direct system-to-system connections and documents**
 103



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 105
 106 Here we can note that system cooperation can be based on direct system-to-system connections and
 107 documents.

- 108
 109 **Proposal(s):**
 110 9) **Different system-to-system connections could be assessed after this consultation.**
 111 10) **Need for different documents for transmitting data between systems could be**
 112 **assessed after this consultation.**

113
 114 **Final remarks / Next generation eForms**
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116 Developing next generation eForms is naturally important for public procurement.

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 118 Processes for public procurement can vary and therefore there could be some modelling work for
 119 different processes. Also detailing different parts (SPEX) of processes is important.

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. 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

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments
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

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

- 166 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
167 http://www.jukkarannila.fi/lausunnot.html#nro_20
168
- 169 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
170 http://www.jukkarannila.fi/lausunnot.html#nro_21
171
- 172 EN: Opinion 23: Public consultation on the review of the European Standardisation System
173 http://www.jukkarannila.fi/lausunnot.html#nro_23
174
- 175 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
176 http://www.jukkarannila.fi/lausunnot.html#nro_27
177
- 178 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
179 http://www.jukkarannila.fi/lausunnot.html#nro_28
180
- 181 EN: Opinion 30: Internet Filtering
182 http://www.jukkarannila.fi/lausunnot.html#nro_30
183 NOTE: Organised by the European Committee for Standardization (CEN) ¹
184
- 185 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
186 http://www.jukkarannila.fi/lausunnot.html#nro_32
187
- 188 EN: Opinion 34: REMIT Registration Format
189 http://www.jukkarannila.fi/lausunnot.html#nro_34
190 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
191
- 192 EN: Opinion 35: Exploiting the employment potential of the personal and household services
193 http://www.jukkarannila.fi/lausunnot.html#nro_35
194
- 195 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
196 http://www.jukkarannila.fi/lausunnot.html#nro_37
197
- 198 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
199 http://www.jukkarannila.fi/lausunnot.html#nro_39
200
- 201 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
202 http://www.jukkarannila.fi/lausunnot.html#nro_40
203
- 204 EN: Opinion 41: AT.39398: observations on the proposed commitments
205 http://www.jukkarannila.fi/lausunnot.html#nro_41
206
- 207 EN: Opinion 42: Opening up Education
208 http://www.jukkarannila.fi/lausunnot.html#nro_42

1 <http://www.cen.eu/> (Accessed 2 July 2012)

2 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 209
210 EN: Opinion 43: Publication of extracts of the European register of market participants
211 http://www.jukkarannila.fi/lausunnot.html#nro_43
212 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
213
214 EN: Opinion 44: Evaluation policy guidelines
215 http://www.jukkarannila.fi/lausunnot.html#nro_44
216
217 EN: Opinion 45: About ICT standardisation
218 http://www.jukkarannila.fi/lausunnot.html#nro_45
219
220 EN: Opinion 46: Review of the EU copyright rules
221 http://www.jukkarannila.fi/lausunnot.html#nro_46
222
223 EN: Opinion 51: European Area of Skills and Qualifications
224 http://www.jukkarannila.fi/lausunnot.html#nro_51
225
226 EN: Opinion 52: Trusted Cloud Europe Survey
227 http://www.jukkarannila.fi/lausunnot.html#nro_52
228
229 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
230 http://www.jukkarannila.fi/lausunnot.html#nro_53
231 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
232
233 EN: Opinion 55: European Energy Regulation
234 http://www.jukkarannila.fi/lausunnot.html#nro_55
235 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
236
237 EN: Opinion 59: Green paper on mobile Health
238 http://www.jukkarannila.fi/lausunnot.html#nro_59
239
240 EN: Opinion 60: Cross-border inheritance tax problems within the EU
241 http://www.jukkarannila.fi/lausunnot.html#nro_60
242
243 EN: Opinion 61: European Register of Products Containing Nanomaterials
244 http://www.jukkarannila.fi/lausunnot.html#nro_61
245
246 EN: Opinion 64: Corporate Social Responsibility - European Commission
247 http://www.jukkarannila.fi/lausunnot.html#nro_64
248
249 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
250 http://www.jukkarannila.fi/lausunnot.html#nro_66
251
252 [Continues on the next page]
253

- 254 EN: Opinion 68: European Network Code Stakeholder Committees
255 http://www.jukkarannila.fi/lausunnot.html#nro_68
256 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
257
258 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
259 http://www.jukkarannila.fi/lausunnot.html#nro_71
260 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
261
262 EN: Opinion 74: Enabling the Internet of Things
263 http://www.jukkarannila.fi/lausunnot.html#nro_74
264 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
265
266 EN: Opinion 80: Mandatory Transparency Register
267 http://www.jukkarannila.fi/lausunnot.html#nro_80
268
269 EN: Opinion 84: Revision of the European Interoperability Framework
270 http://www.jukkarannila.fi/lausunnot.html#nro_84
271
272 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
273 http://www.jukkarannila.fi/lausunnot.html#nro_86
274
275 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
276 http://www.jukkarannila.fi/lausunnot.html#nro_88
277
278 EN: Opinion 89: BEREC Guidelines for net neutrality rules
279 http://www.jukkarannila.fi/lausunnot.html#nro_89
280 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
281
282 EN: Opinion 93: Safety of apps and other non-embedded software
283 http://www.jukkarannila.fi/lausunnot.html#nro_93
284
285
286
287 My opinions to the previous and relevant consultations – there consultations were mostly organised
288 by the Commission of the European Union. General page to all consultations – both in English and
289 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>
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293 [Continues on the next page]
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3 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three “old” parties were not traditionally as the three largest parties. On 2015 this “new” party is part of the current Finnish Government. We all must be interested about this new development in Finland.