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2 Transparency Unit
3 Secretariat General of the European Commission (SG.B.4)
4 European Commission
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7 **Public consultation about the proposal for a mandatory Transparency Register**
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10 First of all, a lot of thanks to the Transparency Unit for organising this important consultation.
11

12 This opinion represents an opinion of an individual citizen, not any legal entity.
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14 This opinion does not contain:

- 15 – any business secrets
 - 16 – any trade secrets
 - 17 – any confidential information.
- 18

19 This opinion is public.

20 Transparency Unit can add the PDF file of this opinion to a relevant web page.
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23 Annex 1 holds information about previous consultations on the European Union level.

24 Annex 2 holds information about disclaimers and copyright.
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27 Best Regards,
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31 Jukka S. Rannila
32 citizen of Finland
33

34 signed electronically
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36

37 [Continues on the next page]
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**40 One general opinion about publishing position papers – before opinions about information
41 systems**

42

43 My initial (1) assumption is that different interest representatives dont object publishing different
44 position papers. My initial (2) assumption is that different stakeholder groups may read different
45 position papers if those position papers are published.

46

47 **Proposal: Transparency Register could be used to systematically collect different
48 position papers (usually PDF files).**

49

50 **Proposal: Using the Transparency Register for collecting different position papers
51 could be assessed after this consultation.**

52

53 Naturally we have ¹ EUSurvey software which can be used for collecting different
54 positions/opinions. However, there should be always possibility to upload different position/opinion
55 papers – this issue can be solved with some basic instructions when using the Transparency Register
56 software.

57

58 One example for developing the Transparency Register

59

60 In the previous consultations I have used web feeds as an example.

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63

64 To be precise, there are some standards for ² web feeds: RSS 2.0 ³ standard and Atom ^{4 5} standards.
65 There are different software which comply with these standards (RSS and Atom).

66

67 It can be noted, that different back-office systems (with a wide variety of different technologies) can
68 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
69 kind solutions front-office systems dont need direct system-to-system communications with back-
70 office systems.

71

72 Here we can note that there are several systems provided by different European Union institutes and
73 those systems provide RSS feeds.

74

75 **Proposal: Usage of different web feeds (RSS and/or Atom) should be assessed carefully
76 when developing the Transparency Register.**

1 <https://joinup.ec.europa.eu/software/eusurvey/home>, EUSurvey home page

2 http://en.wikipedia.org/wiki/Web_feed, Web feed

3 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

4 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

5 <http://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

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78 **More different identifiers (ID)?**

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80 From the Transparency Register ⁶ web page it is possible to search information of different interest
 81 representative communities. Like other registers Transparency Register has a specific identifier
 82 (ID).

83

84 **Note: The number of different identifiers (ID) is increasing all the time.**

85

86 In the previous consultations there has been discussion about different identifiers (ID) in the
 87 different systems. It can be noted from the previous opinions, that there will be several and different
 88 identifiers (ID) for different levels. On the European Union level there can be several identifiers
 89 (ID), e.g. following:

90

91 * global identifiers (ID)

92 * EU-wide identifiers (ID)

93 * general member state identifiers (ID)

94 * several identifiers (ID) in a member state.

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96 **Proposal: There could be a systematic review of different identifiers (ID) which are**
 97 **related transparency issues.**

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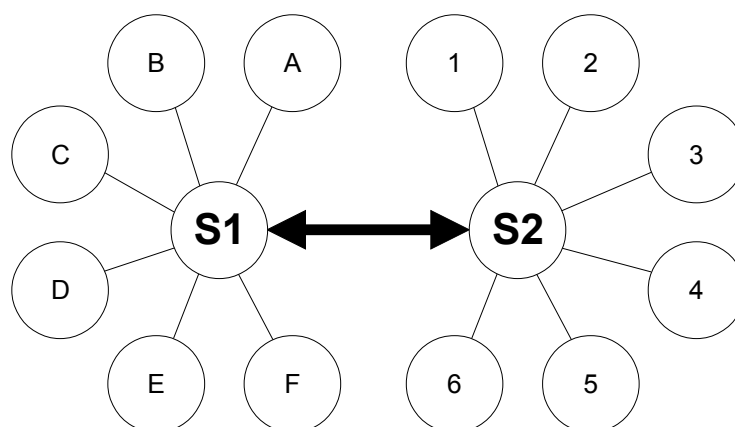
99 An example could be that stakeholder communities may have a national identifier (ID) in some
 100 member states. Not all member states require registration of interest representatives on the national
 101 level.

102

103 **Added value of different identifiers (ID)?**

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106

6 <http://ec.europa.eu/transparencyregister/public/homePage.do>,

107 Here we can note possible cooperation between different systems and usually cooperation between
108 different systems means using different identifiers (ID). There can be some central (S1 ↔ S2)
109 systems which collect information from other systems which have own identifiers (ID).

110

111 An example is naturally (possible) cooperation with European Parliament and European
112 Commission information systems.

113

114 **Different systems (inside / outside) using different identifiers (ID)**

115

116 Here we can note the Comitology Register ⁷ organised by the European Commission. An example of
117 cooperation could be using Transparency Register identifier (ID) for communities involved in
118 comitology work.

119

120 **Proposal: Cooperation (using identifiers, ID) between Transparency Register and with**
121 **internal systems (European Union institutions) could be assessed carefully – e.g.**
122 **Transparency Register and Comitology Register.**

123

124 **Proposal: Cooperation (using identifiers, ID) between Transparency Register and with**
125 **external systems (outside European Union institutions) could be assessed carefully.**

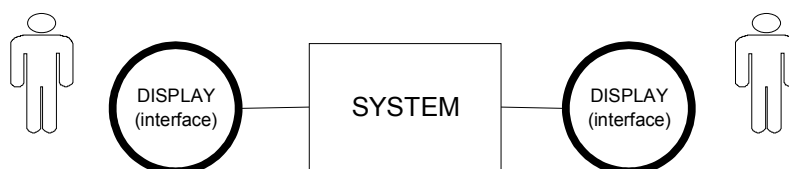
126

127 **Different displays and interfaces? (API: Application programming interface)**

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129 Here we can note that all information systems have different displays and interfaces. Different
130 identifiers (ID) are also used with different displays and interfaces. Some stakeholder groups can
131 use term “application programming interface” (API).

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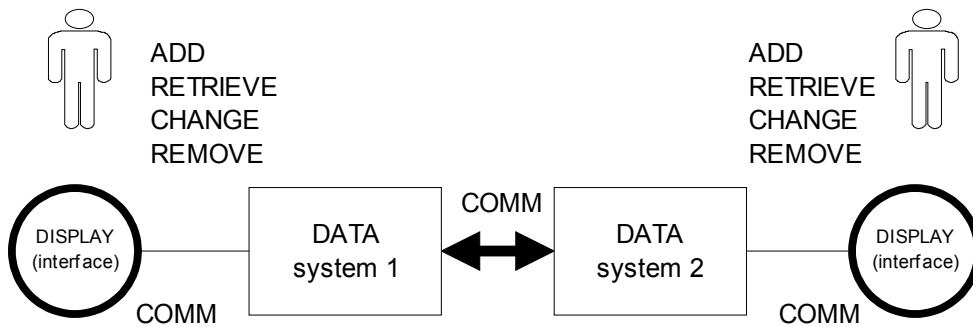
135 **Cooperation between systems**

136

137 Here we can note cooperation between systems based on system-to-system communication. Also
138 general usage of a system can be noted: retrieving, adding, changing and removing data in an
139 information system.

140

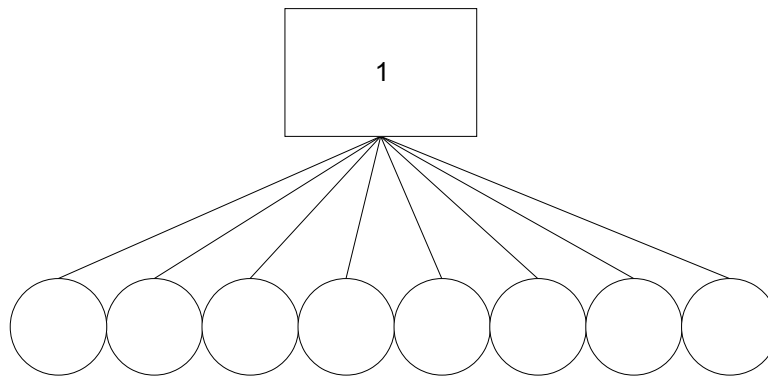
7 <http://ec.europa.eu/transparency/regcomitology/index.cfm>, Comitology Register



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Number of different displays and interfaces? (API: Application programming interface)

In previous opinions I have advocated creation of several displays and interfaces based on the needs of different stakeholder communities.



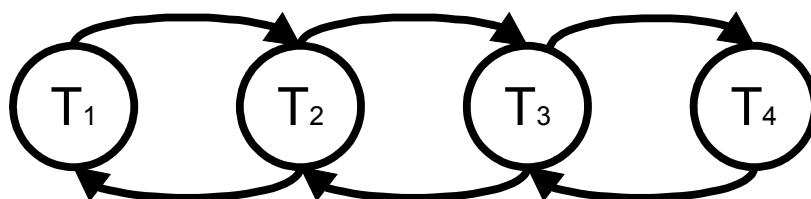
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Proposal: Number of different interfaces should be assessed carefully.

Proposal: Creating different displays and interfaces for Transparency Register could be assessed carefully.

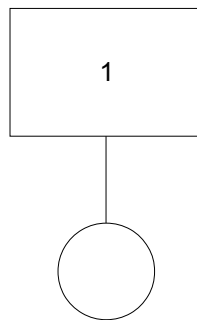
Note: Different displays and interfaces would be different features of a system when compared with web feeds (RSS and/or Atom).

From (T_n↔T_n) beginner users to expert user / Different user experiences

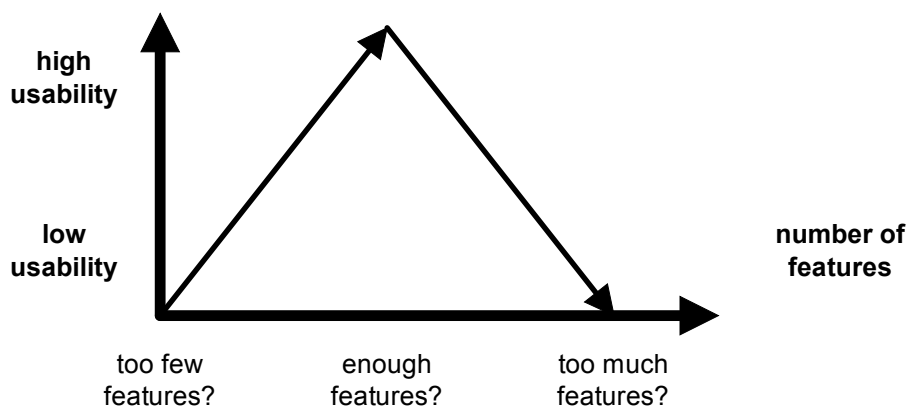


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162 Here we can note people learn usage of an information system with different timeframes ($T_n \leftrightarrow T_n$).
 163 In time beginners can become expert users after some experience of using a system. A general
 164 mistake is to create just one interface to all stakeholder groups – in many cases interface is
 165 developed for beginners.
 166



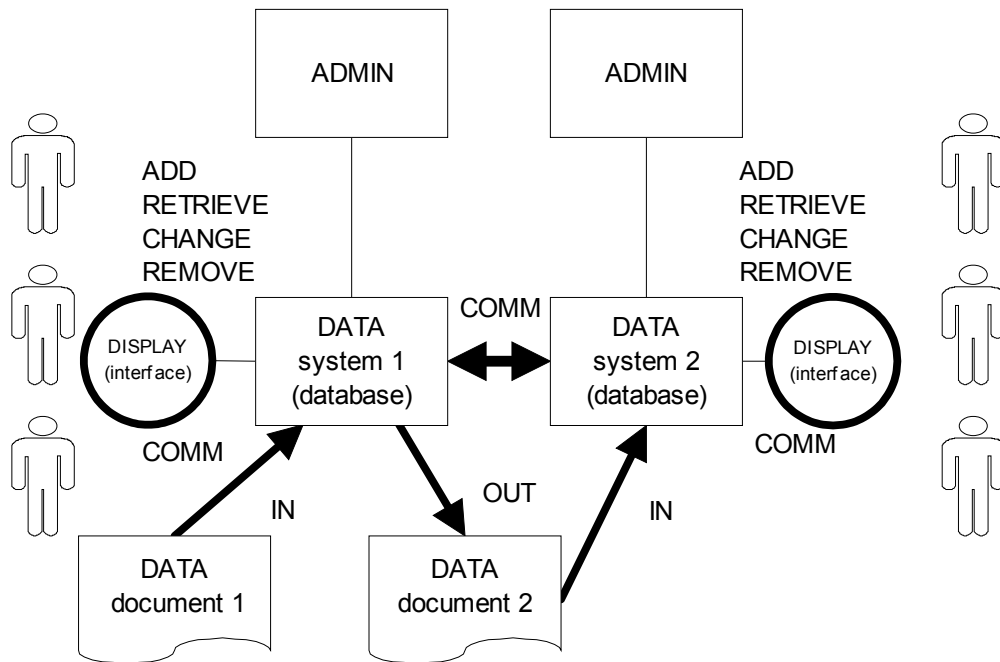
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 168
 169 In reality expert users need efficient shortcuts to all functions in an information system. After
 170 creating an interface to experts users there can be development of interfaces to other stakeholder
 171 groups.
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 174
 175 It is also possible that there are too many features implemented in an information system; too many
 176 features means problems for expert users and average users. Like said before there has to be
 177 different interfaces – not just one interface for beginners.

178
 179 **Question about open data?**

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 181 In some cases public sector information systems can provide open data – either free or with nominal
 182 fees. Here we can note that data can be provided in documents and/or in databases. Data can be
 183 provided either realtime or in some timeframes.
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Proposal: Providing open data from the Transparency Register could be assessed carefully.

Proposal: Providing (open) data with different timeframes could be assessed carefully.

Proposal: Providing (open) data directly from database(s) could be assessed carefully.

Proposal: Providing (open) data as documents could be assessed carefully.

Generally speaking different stakeholder communities can use open data in very intelligently – also adding other (open) data for creation an information service is a possibility.

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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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

- 249 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
250 http://www.jukkarannila.fi/lausunnot.html#nro_20
- 251 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
252 http://www.jukkarannila.fi/lausunnot.html#nro_21
253
- 254 EN: Opinion 23: Public consultation on the review of the European Standardisation System
255 http://www.jukkarannila.fi/lausunnot.html#nro_23
256
- 257 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
258 http://www.jukkarannila.fi/lausunnot.html#nro_27
259
- 260 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
261 http://www.jukkarannila.fi/lausunnot.html#nro_28
262
- 263 EN: Opinion 30: Internet Filtering
264 http://www.jukkarannila.fi/lausunnot.html#nro_30
- 265 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
266
- 267 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
268 http://www.jukkarannila.fi/lausunnot.html#nro_32
269
- 270 EN: Opinion 34: REMIT Registration Format
271 http://www.jukkarannila.fi/lausunnot.html#nro_34
- 272 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
273
- 274 EN: Opinion 35: Exploiting the employment potential of the personal and household services
275 http://www.jukkarannila.fi/lausunnot.html#nro_35
276
- 277 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
278 http://www.jukkarannila.fi/lausunnot.html#nro_37
279
- 280 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
281 http://www.jukkarannila.fi/lausunnot.html#nro_39
282
- 283 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
284 http://www.jukkarannila.fi/lausunnot.html#nro_40
285
- 286 EN: Opinion 41: AT.39398: observations on the proposed commitments
287 http://www.jukkarannila.fi/lausunnot.html#nro_41
288
- 289 EN: Opinion 42: Opening up Education
290 http://www.jukkarannila.fi/lausunnot.html#nro_42
291

⁸ <http://www.cen.eu/> (Accessed 2 July 2012)

⁹ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 292 EN: Opinion 43: Publication of extracts of the European register of market participants
293 http://www.jukkarannila.fi/lausunnot.html#nro_43
294 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
295
- 296 EN: Opinion 44: Evaluation policy guidelines
297 http://www.jukkarannila.fi/lausunnot.html#nro_44
298
- 299 EN: Opinion 45: About ICT standardisation
300 http://www.jukkarannila.fi/lausunnot.html#nro_45
301
- 302 EN: Opinion 46: Review of the EU copyright rules
303 http://www.jukkarannila.fi/lausunnot.html#nro_46
304
- 305 EN: Opinion 51: European Area of Skills and Qualifications
306 http://www.jukkarannila.fi/lausunnot.html#nro_51
307
- 308 EN: Opinion 52: Trusted Cloud Europe Survey
309 http://www.jukkarannila.fi/lausunnot.html#nro_52
310
- 311 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
312 http://www.jukkarannila.fi/lausunnot.html#nro_53
313 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
314
- 315 EN: Opinion 55: European Energy Regulation
316 http://www.jukkarannila.fi/lausunnot.html#nro_55
317 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
318
- 319 EN: Opinion 59: Green paper on mobile Health
320 http://www.jukkarannila.fi/lausunnot.html#nro_59
321
- 322 EN: Opinion 60: Cross-border inheritance tax problems within the EU
323 http://www.jukkarannila.fi/lausunnot.html#nro_60
324
- 325 EN: Opinion 61: European Register of Products Containing Nanomaterials
326 http://www.jukkarannila.fi/lausunnot.html#nro_61
327
- 328 EN: Opinion 64: Corporate Social Responsibility - European Commission
329 http://www.jukkarannila.fi/lausunnot.html#nro_64
330
- 331 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
332 http://www.jukkarannila.fi/lausunnot.html#nro_66
333
- 334 EN: Opinion 68: European Network Code Stakeholder Committees
335 http://www.jukkarannila.fi/lausunnot.html#nro_68
336 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

337

338 EN: Opinion 71: Common Schema for the Disclosure of Inside Information

339 http://www.jukkarannila.fi/lausunnot.html#nro_71

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

341

342 EN: Opinion 74: Enabling the Internet of Things

343 http://www.jukkarannila.fi/lausunnot.html#nro_74

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

345

346

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348 by the Commission of the European Union. General page to all consultations – both in English and

349 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

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352 [Continues on the next page]

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364

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369

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396 <http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

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10 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.