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TO:  
European Commission  
DG Migration and Home Affairs

**Opinion: COM(2016) 882 final – 2016/0408 (COD)**

**Official title for the proposed regulation:**  
**REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
**on the establishment, operation and use of the Schengen Information System (SIS) in the**  
**field of border checks, amending Regulation (EU) No 515/2014 and repealing Regulation**  
**(EC) No 1987/2006**

First of all, a lot of thanks to DG Migration and Home Affairs 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 disclaimers and copyright.  
Annex 2 holds information about disclaimers and copyright.

Best Regards,  
Jukka S. Rannila  
citizen of Finland  
signed electronically

[Continues on the next page]

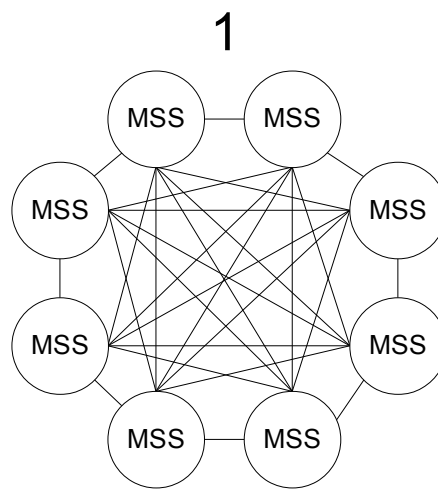
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**Previous opinions – mostly about information technology issues**

Annex 2 lists information about previous public consultations and previous opinions.

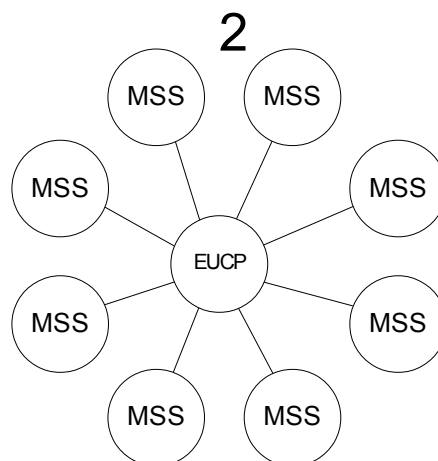
**About member state systems (MSS)**

Based on previous consultations I have noted that different member state systems (MSS) may have complex many-to-many connections.



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**European Union contact point (EUCP) – direct contacts**



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Opposite solution is naturally to have just one European Union contact point (EUCP) which have direct one-to-one connections with just one member state system (MSS).

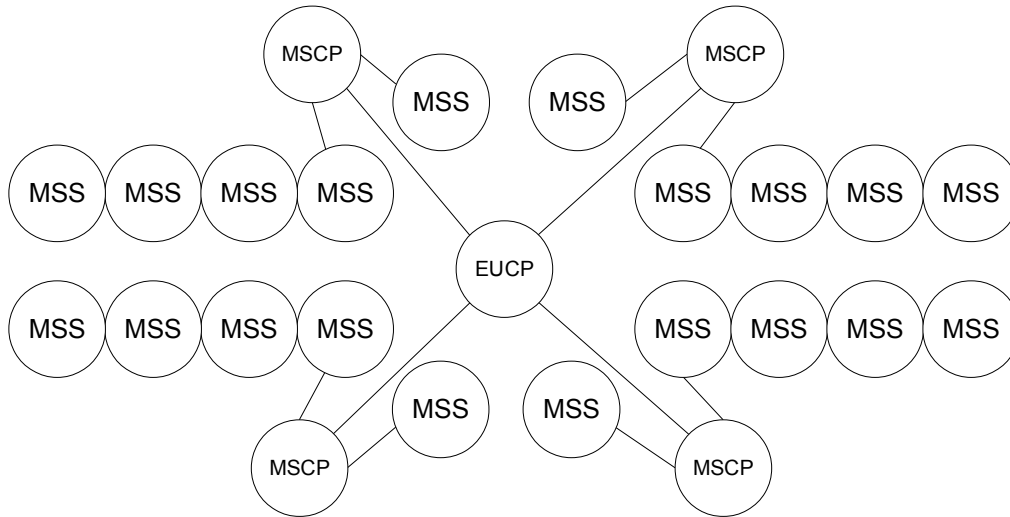
62 In reality situations vary in different member states and there can be several system.

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64 **Member state contact point (MSCP)**

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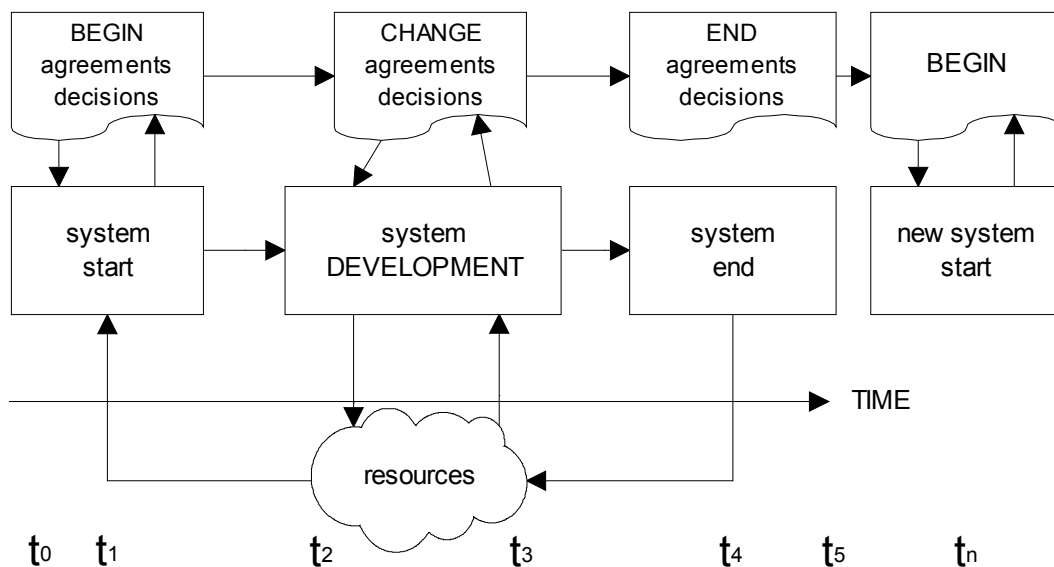
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68 Previously I have proposed creation of member state contact points (MSCP) which can then  
 69 consolidate different member state system (MSS) on the national level. Based on cooperation  
 70 between member state contact points (MSCP) and European Union contact point (EUCP) there can  
 71 be less complex many-to-many connections.

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73 **About life-cycles of different information systems**

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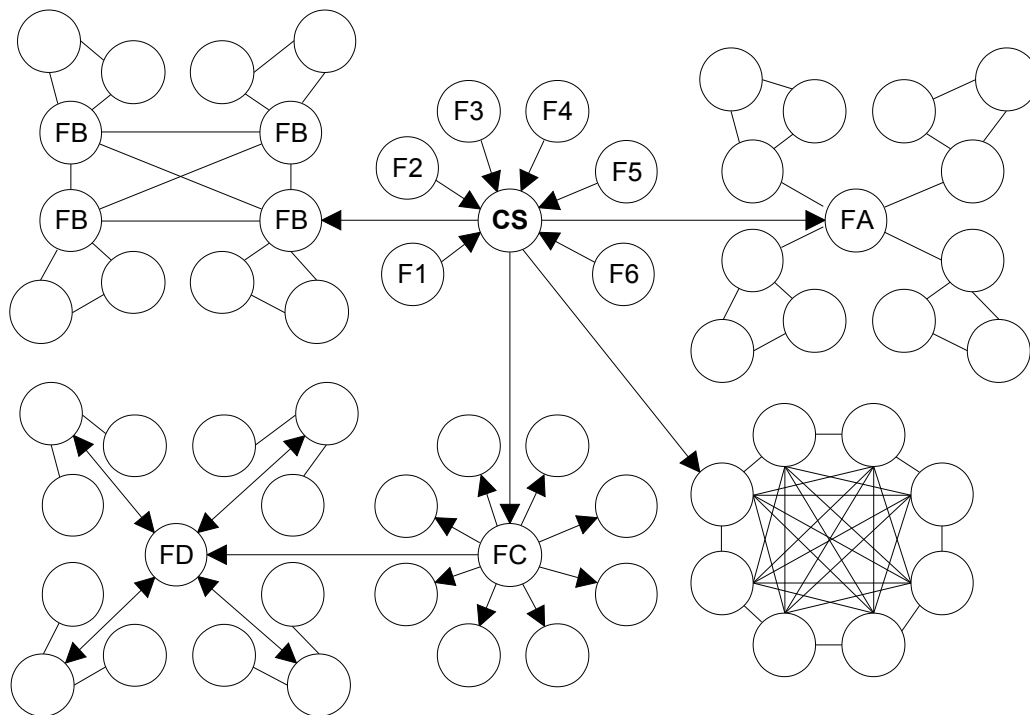
76

77 In reality member state system (MSS) have different situations and there are different life-cycles  
78 with these systems. Based on different life-cycles member states can consolidate their systems when  
79 there are member state contact points (MSCP).

80

81 **Reality: there can still be complex connections**

82



83

84

85 Here we can note that the Schengen Information System (SIS) can be one central system (CS).

86

87 There has to be clearly defined standards/formats which are needed for cooperation between  
88 different systems.

89

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

91

92 I have advocated usage of web feeds on several previous opinion documents. Actually there are two  
93 standards for web feeds: RSS <sup>1 2</sup> and Atom <sup>3 4 5</sup>

94

95 [Continues on the next page]

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

2 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

3 [https://en.wikipedia.org/wiki/Atom\\_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

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

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



96  
97 Widely used figure for presenting web feeds (RSS and Atom)  
98

99 It can be noted, that different back-office systems (with a wide variety of different technologies) can  
100 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this  
101 kind solutions front-office systems dont need direct system-to-system communications with back-  
102 office systems.  
103

104 **Summary: consolidation of different member state systems (MSS) with member state contact**  
105 **points (MSCP) can take some time**  
106

107 Consolidation of different member state systems (MSS) with can take some time.  
108

109 Possibly DG Migration and Home Affairs could agree on timetables for consolidating different  
110 member state systems (MSS) with member state contact points (MSCP).  
111

112 Since member state have different situations with their systems it may be impossible to establish  
113 cooperation between member state contact points (MSCP) and European Union contact point  
114 (EUCP) at the same time in all members states.  
115

116  
117  
118 **Good luck!!!**  
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120 This opinion is quite limited. Hopefully there are other constructive ideas presented in other  
121 opinions. This remains to be seen.  
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123 [Continues on the next page]

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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](http://www.jukkarannila.fi/lausunnot.html#nro_1)

EN: Opinion 2: Schools for the 21st Century  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_2](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](http://www.jukkarannila.fi/lausunnot.html#nro_3)

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_5](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](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_8)

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_9](http://www.jukkarannila.fi/lausunnot.html#nro_9)

EN: Opinion 15: Collective Redress  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_15](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_18)

EN: Opinion 19: Official Acknowledgement by the Commission  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)

- 169 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
170 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
171
- 172 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
173 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
174
- 175 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
176 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
177
- 178 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
179 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
180
- 181 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
182 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
183
- 184 EN: Opinion 30: Internet Filtering  
185 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
186 NOTE: Organised by the European Committee for Standardization (CEN) <sup>6</sup>  
187
- 188 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
189 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
190
- 191 EN: Opinion 34: REMIT Registration Format  
192 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
193 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>7</sup>  
194
- 195 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
196 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
197
- 198 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
199 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
200
- 201 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
202 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
203
- 204 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
205 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
206
- 207 EN: Opinion 41: AT.39398: observations on the proposed commitments  
208 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
209
- 210 EN: Opinion 42: Opening up Education  
211 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)

<sup>6</sup> <http://www.cen.eu/> (Accessed 2 July 2012)

<sup>7</sup> <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 212  
213 EN: Opinion 43: Publication of extracts of the European register of market participants  
214 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
215 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
216  
217 EN: Opinion 44: Evaluation policy guidelines  
218 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
219  
220 EN: Opinion 45: About ICT standardisation  
221 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
222  
223 EN: Opinion 46: Review of the EU copyright rules  
224 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
225  
226 EN: Opinion 51: European Area of Skills and Qualifications  
227 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
228  
229 EN: Opinion 52: Trusted Cloud Europe Survey  
230 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
231  
232 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
233 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
234 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
235  
236 EN: Opinion 55: European Energy Regulation  
237 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
238 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
239  
240 EN: Opinion 59: Green paper on mobile Health  
241 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
242  
243 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
244 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
245  
246 EN: Opinion 61: European Register of Products Containing Nanomaterials  
247 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
248  
249 EN: Opinion 64: Corporate Social Responsibility - European Commission  
250 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
251  
252 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
253 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
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255 [Continues on the next page]  
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- 257 EN: Opinion 68: European Network Code Stakeholder Committees  
258 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
259 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
260  
261 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
262 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
263 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
264  
265 EN: Opinion 74: Enabling the Internet of Things  
266 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
267 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
268  
269 EN: Opinion 80: Mandatory Transparency Register  
270 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
271  
272 EN: Opinion 84: Revision of the European Interoperability Framework  
273 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
274  
275 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
276 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
277  
278 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
279 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
280  
281 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
282 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
283 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
284  
285 EN: Opinion 93: Safety of apps and other non-embedded software  
286 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
287  
288 EN: Opinion 95: Targeted consultation on eForms  
289 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
290  
291 My opinions to the previous and relevant consultations – there consultations were mostly organised  
292 by the Commission of the European Union. General page to all consultations – both in English and  
293 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>  
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**ANNEX 2**

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302

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8 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.