

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40

TO: API@business.govt.nz

Result 9 Better APIs for Business
Ministry of Business, Innovation and Employment
New Zealand

Public opinion about providing better APIs (Application Programming Interfaces) for integrated digital services in New Zealand (and abroad)

First of all, a lot of thanks to the Ministry of Business, Innovation and Employment (Ministry) for organising this important consultation about providing better APIs.

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.

Ministry of Business, Innovation and Employment can add the PDF of this opinion to a relevant web page.

Annex 1 holds information about previous consultations.
Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland (Europe)

signed electronically

41 **Importance of different APIs (Application Programming Interfaces)**

42

43 As a general note it can be concluded all relevant information systems provide different APIs to be
44 used by other systems. Generally speaking it can be concluded, that the number of different APIs is
45 increasing – not decreasing.

46

47 However, it can be also concluded, that there are serious problems with some/different APIs, and
48 this consultation may give us different solutions (national, regional and global) for mitigating
49 problems with APIs.

50

51 **Limitation: Opinion of an individual citizen – not any legal entity**

52

53 Since this opinion is created by an individual citizen, the knowledge base for this consultation is
54 naturally rather limited, since there has not been a group of experienced experts writing this
55 opinion.

56

57 **European Union (EU) context / Finnish context**

58

59 At the moment it can be said, that also in European Union and in Finland there is ongoing some
60 serious work related to different aspects of computerisation of different public sector services.

61

62 Possibly we can learn something (EU and Finland) from New Zealand based on this consultation.

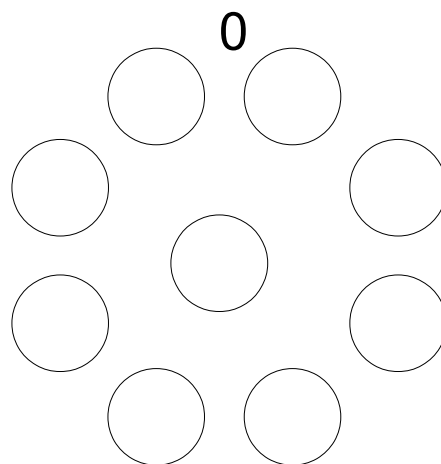
63

64 **The current reality in many cases**

65

66 Here we can conclude that generally speaking we use some systems which are stand-alone solutions
67 and there is not a need for integrating different systems.

68



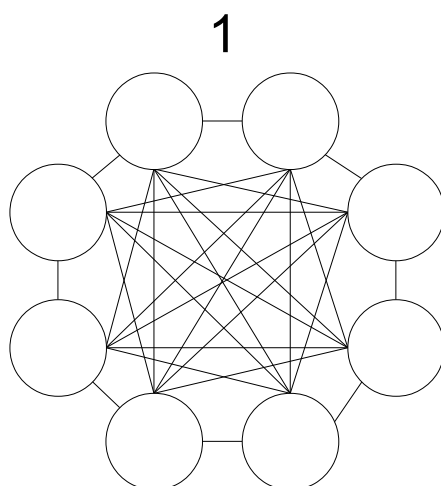
69

70

71 However, real added value of different systems is based on actual cooperation between different
72 systems. Then we face the question different integrations / integration strategies.

73

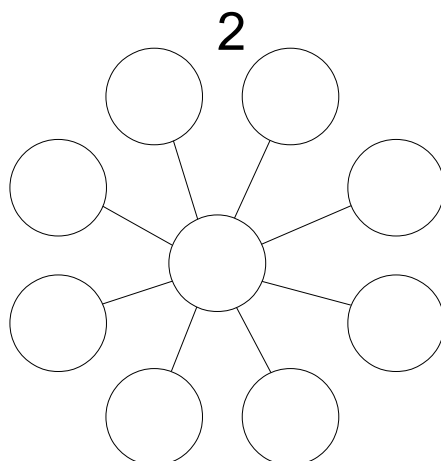
74 One problem is naturally complex system-to-system connections, and this can lead to very serious
75 problems in the maintenance and development. The next figure tries to describe this situation. I
76 suppose that also in the New Zealand context there can be different interlinked / interconnected
77 systems.



78

79

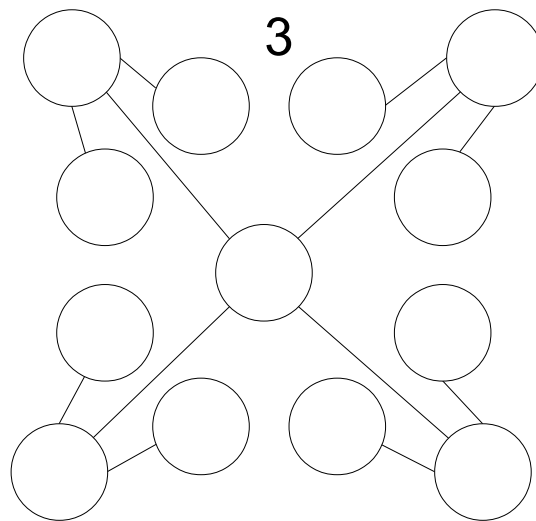
80 One obvious solution is to have a contact point, and different (national) systems could be
81 connected. In reality having one contact point can lead to a situation with too many connections,
82 and this can lead to different IT havocs when the contact point is facing different problems. I
83 suppose that there are similar situations in New Zealand, and connecting a selection of state systems
84 to a (national) contact point can mean a lot of integration efforts, which mean using time and
85 resources.



86

87

88 I suppose that there are similar situations in New Zealand, and connecting a selection of state
89 systems to a state-level contact point can mean less integration projects.



90
91

92 Here we can note that systems can be also hierarchically organised and then there is less
93 pressure for different central systems.

94

95 **Note: The situation with New Zealand (public sector) information systems is naturally**
96 **between these different extremes.**

97

98 **Some basic features of different information systems**

99

100 Like the following figure indicates, there are databases in different information systems. Then there
101 are different documents for transmitting data between different system.

102

103 Here we can note especially following standardisation needs for different parts of the proposed IT
104 platform:

105

* communication standards

106

* data standards (also document standards)

107

* database standards

108

* display / interface standards.

109

110 **Proposal: There could different standardisation efforts for communication, data,**
111 **document, database, display/interface standards.**

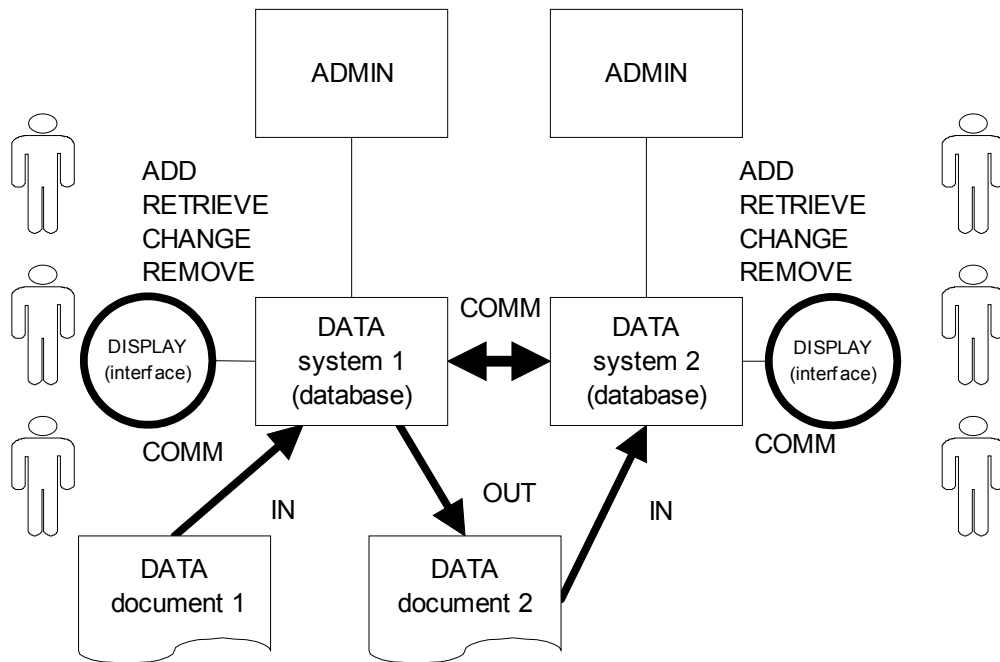
112

113 **Proposal: Assessing previously developed standards could be done seriously.**

114

115 One comprehensive list for different standard developing organisations (SDO) is provided ¹
116 ConsortiumInfo.org. It may possible to use previously developed standards.

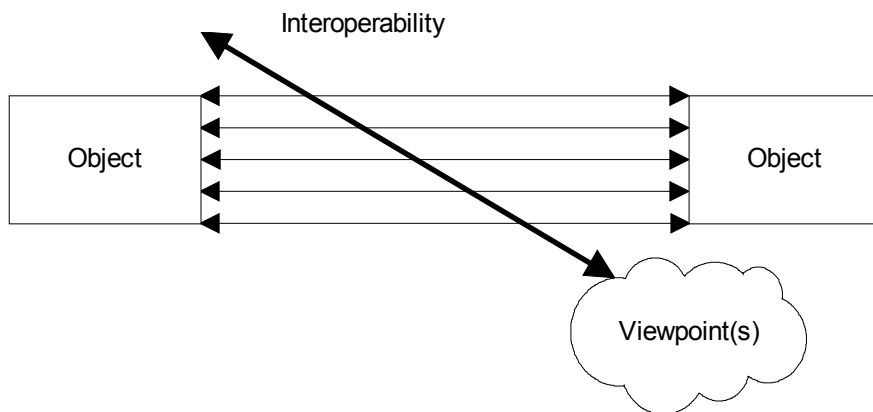
¹ <http://www.consortiuminfo.org/links/linksall.php>, List of different standard developing organisations



117
118
119
120
121
122
123
124

Here we can note that there can be direct system-to-system connections, which can mean some standardised interfaces. Also we can note that different document formats can be used when there is system-to-system connections.

Managing different viewpoints



125
126
127
128
129
130
131

Here we can conclude, that there can be several viewpoints to be handled when developing different information systems. There can be several viewpoints: e.g. (case) law, time, environment, waste, quality, effectiveness, outsourcing, different technologies, information technology in specific, money, security, internationalisation, anti-trust, competition, process models, etc.

132 **Proposal: The Ministry could collect information based on different viewpoints.**

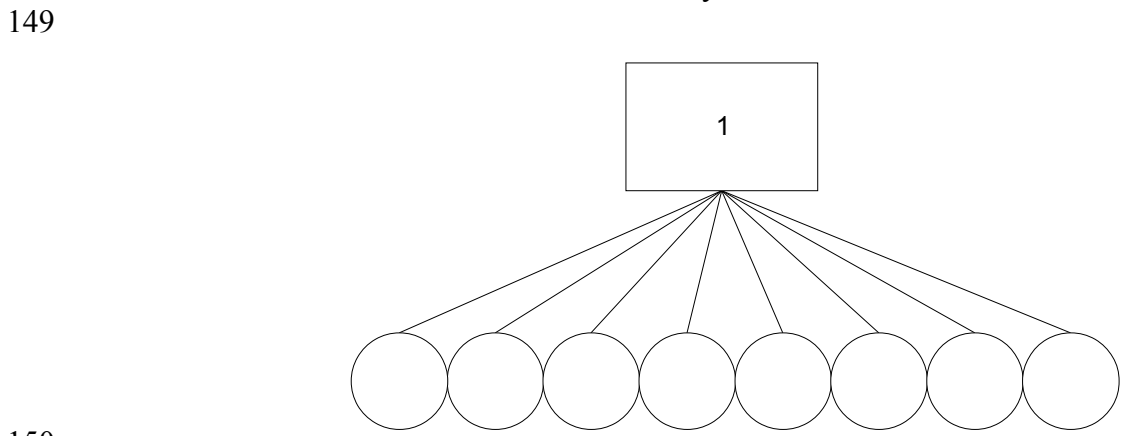
133
 134 Parts of interoperability in a system are based on different viewpoints. This consultation about APIs
 135 is naturally one way of collecting information based on different viewpoints. Generally speaking
 136 many processes are quite easy to model, but some viewpoint means rather long learning processes;
 137 e.g. understanding parts of medical information (expertise) can demand a lot of learning.

138
 139 **Note: Implementing interfaces based on all possible viewpoints in a system can take**
 140 **some time.**

141
 142 **Different interfaces based on different viewpoints**



144
 145
 146 It is possible that some information systems can provide only one interface. However, I have noted
 147 that different viewpoints can mean different interfaces for an information system. Here we can note
 148 that there can be more than one interface for a system.



150
 151
 152 Here we can note that this consultation is about different APIs. It can be noted that there will be
 153 different interfaces for different purposes (viewpoints).

154
 155 **Proposal: There could be serious assessment of different viewpoints.**

156
 157 **Proposal: After serious assessment of different viewpoints there can be proposals for**

158 **different interfaces.**

159

160 **Standardising (SPEX) different parts of processes**

161

162 Based on the previously proposed actions there can be a clear understanding of different processes.

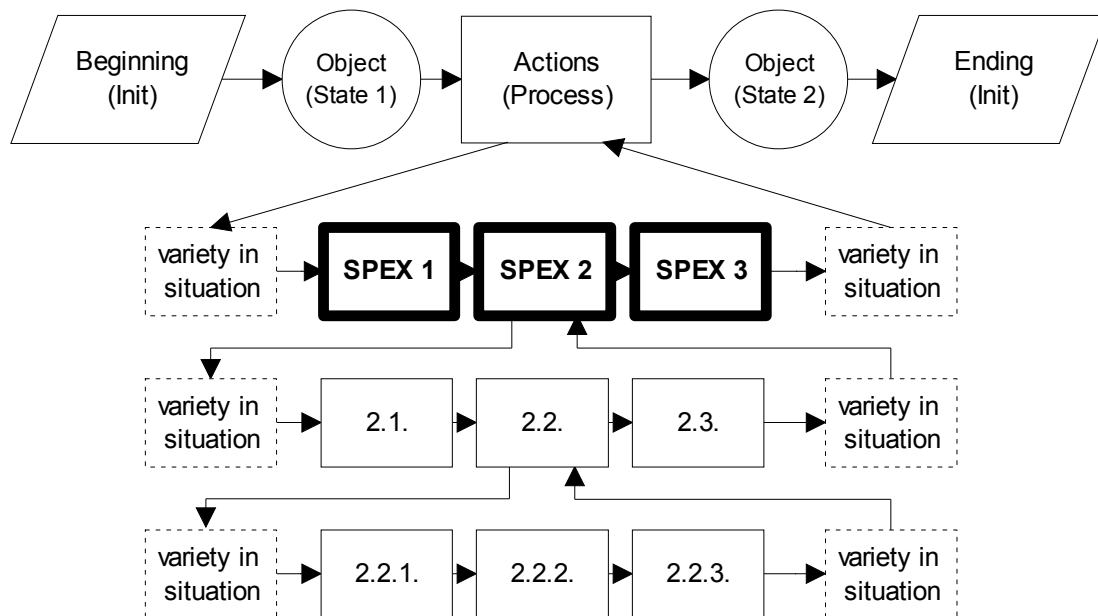
163 It can be noted that describing different processes can mean a lot of work for different stakeholders.

164

165 It can be noted here that describing different processes are implement in information systems which
 166 are hierarchically structured. So there is always some possible mismatches between actual process
 167 models and actual hierarchy of system.

168

169 Here we can note, that in a process some objects change their state in different stages.



170

171

172 **Proposal: After some serious assessment there could be some serious work for**
 173 **standardised (SPEX) interfaces and displays.**

174

175 **Proposal: Some parts of the processes could be standardised for interfaces (SPEX) for**
 176 **different stakeholders.**

177

178 **Proposal: Some standardised customer interfaces (SPEX) could be used for having**
 179 **better service processes for different stakeholders.**

180

181 It can be noted, that several systems could implement (SPEX) the same parts of different processes,
 182 even though the technology in different systems can be totally different.

183

184 **Actual reality / Different standards and standards versions**

185

186 Previously (different consultations) I have advocated open standards for different information
187 systems.

188

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

193

194 **Note: It is always possible that some wrong standards are selected.**

195

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

202

203 **Proposal: There could be a roadmap for implementing different open standards in**
204 **different timeframes.**

205

206 This roadmap for open standards can mean cataloguing different (all?) information systems. Then it
207 could be possible to have a description of life-cycles of different information systems. It may be
208 possible to enforce open standards when a “old” system is to be terminated and there is
209 considerations for a “new” system.

210

211 **Note: This enforcement of different open standards can mean some work for years**
212 **based on the nature of current information systems.**

213

214 **Horizontal standards and vertical standards for system-to-system communication**

215

216 In previous opinions I have advocated developing different horizontal standards.

217

218 **Proposal: There could be some assessment(s) for comparing different horizontal**
219 **standards.**

220

221 **Proposal: There could be some assessment(s) for comparing different vertical standards.**

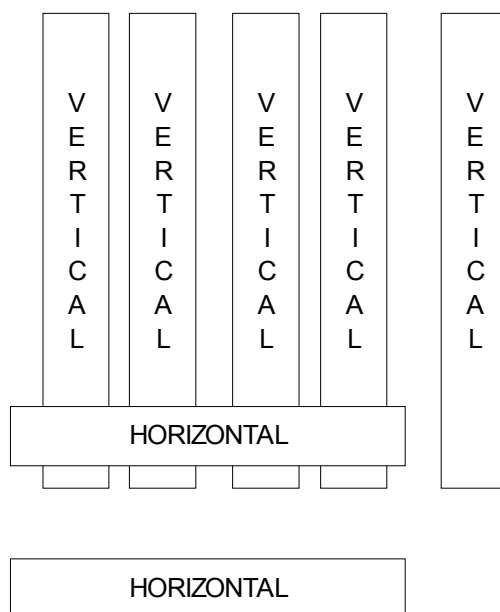
222

223 One example of an horizontal standard is the email standard, since there are several vertical
224 systems, which comply with email standards, and email messages can be transmitted between
225 different email systems based on very different technological solutions.

226

227 **Proposal: Developing different horizontal standards could be favoured.**

228



229
230

231 **Discussion about SOAP and REST – what must be implemented?**

232

233 There was some considerations of SOAP and REST on the “Better APIs for Business” web page.

234

235 It may be possible that there has to implementation of both standards since different receiving
236 systems outside the government are implemented with very different technologies. Then these
237 receiving systems have different life-cycles and this affects possibilities for implementing different
238 standards – e.g. SOAP and REST.

239

240 **Layered systems – the hard reality**

241

242 Next figure tries to describe the reality of layered systems. In reality the added value for users
243 (citizens and different legal entities) is achieved by combining different systems to provide different
244 services.

245

246 In reality the added value for different stakeholders is cooperation between different systems. In
247 reality this consolidation of different systems mean a lot of work with different stakeholders.

248

249 **Proposal: The Ministry could collect information about different chains of different**
250 **information systems.**

251

252 **Note: Some of these chained information systems are CLOSED systems.**

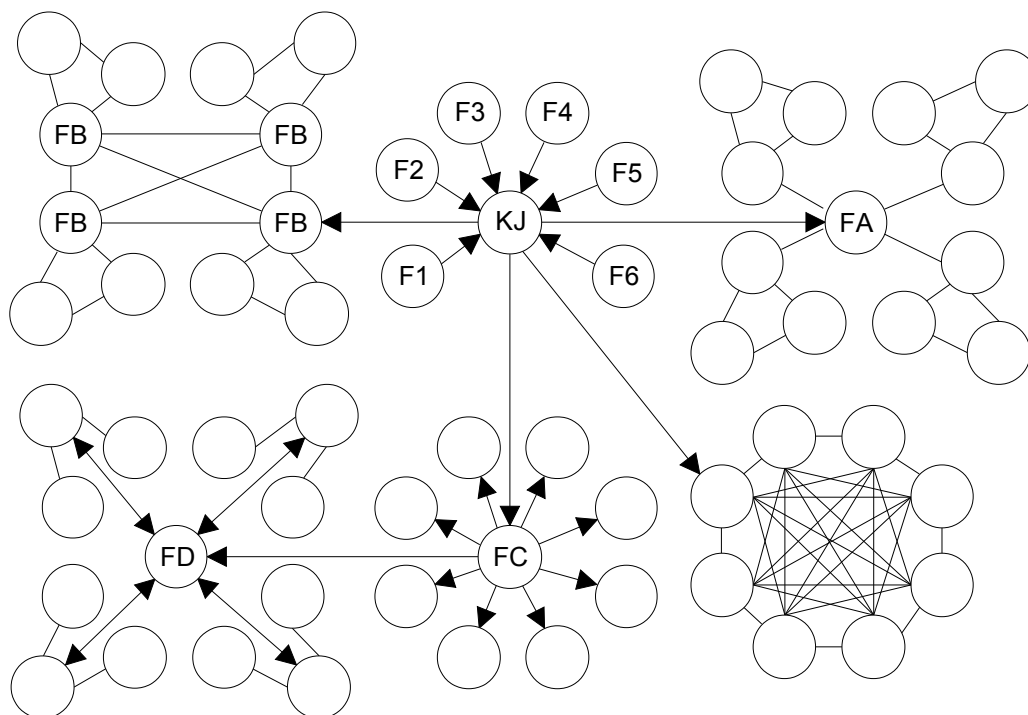
253

254 **Note: Some of these chained information systems are OPEN systems.**

255

256 Next figure tries to explicate different standards/formats between different systems. Some

257 standards/formats are closed and some standards are closed.
258



259
260

261 **More and more different codes and/or identifiers (ID)?**

262

263 From the previous consultations we can conclude the importance of different identifiers (ID). More
264 IDs is one of the consequences of digitalisation (of everything). The ID is identifier in an
265 information system.

266

267 Like the previous figure indicated, there can be several formats (FA-FD and FI-F6) to be used in
268 different information systems. Different information systems have also internal identifiers (ID) and
269 external identifiers (ID) for (possible) public usage. The added value for different stakeholders is
270 provided by combination of different identifiers (ID) in a specific information system.

271

272 **Proposal: There could be some assessment(s) based on different versions of different**
273 **identifiers (ID).**

274

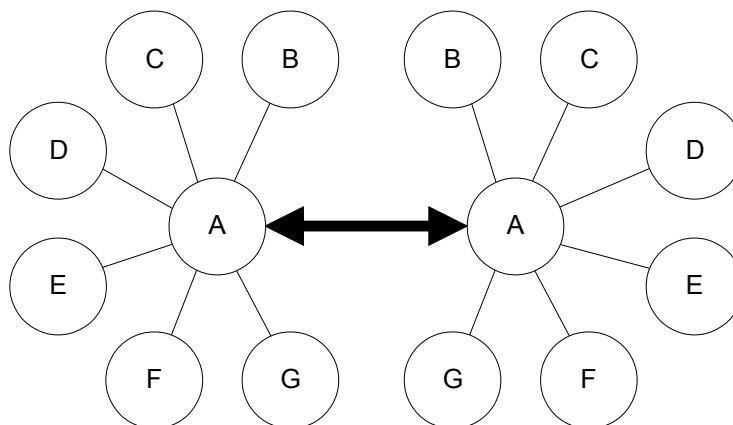
275 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
276 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
277 (ID), but this consolidation means some serious technical and administrative actions.

278

279 **Proposal: Legacy identifiers (ID) could be assessed seriously.**

280

1-2



281
282
283 **Proposal: Consolidating different legacy identifiers (ID) could be assessed seriously.**

284
285 It could be said, that consolidation to one format (A in the figure) can be hid to different back-
286 ground systems (B-G in the figure); in this way there could be one well-defined and public API,
287 which uses just one identifier (ID).

288
289 **Proposal: The number of different identifiers (ID) should be assessed critically.**

290
291 **Proposal: There could be a systematic project to collect relevant information of**
292 **different identifiers: e.g. global, regional and national.**

293
294 When information about relevant identifiers is collected, there could be a serious assessment of
295 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
296 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

297
298 **Proposal: The nature of different identifiers (ID) could be assessed.**

299
300 **Proposal: There could be serious negotiations with some providers of identifiers (ID).**

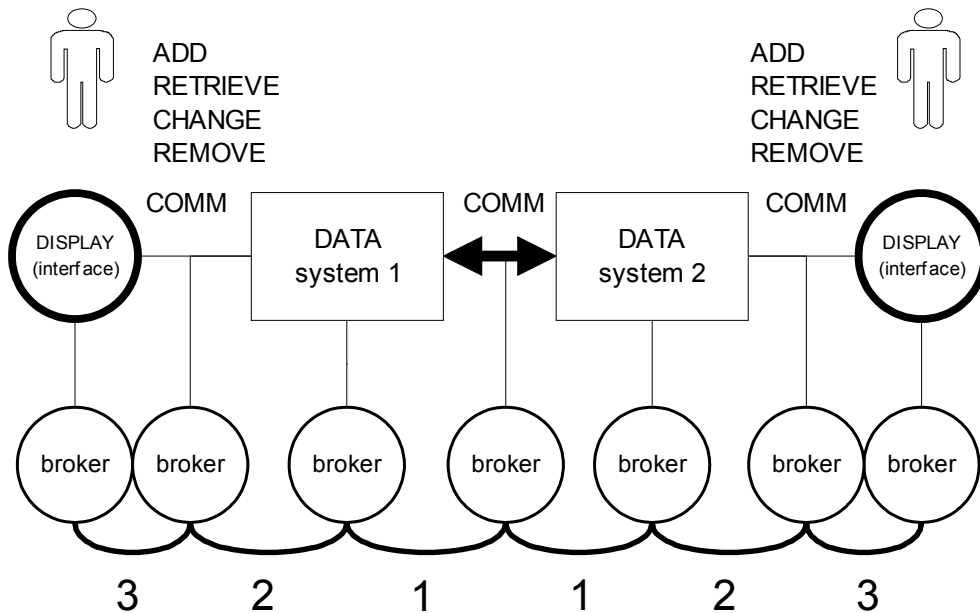
301
302 In the European Union there has been different anti-trust cases which are related to different private
303 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
304 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation and this
305 kind situations can be also in the New Zealand context.

306
307 **About brokered systems – actual usage of identifiers (ID)**

308
309 Here we can conclude that there are different broker (can be called also as “trusted third parties”)
310 system, e.g. with electronic commerce there are some trusted third parties to handle monetary
311 transactions between a buyer and a seller.

312
313
314

Proposal: Different broker systems (“trusted third parties”) could be assessed.



315
316
317

Owner, member or agreement?

318
319
320
321
322
323

Here we can note the difference between owners, agreements and members. In reality ownerships agreements and memberships cause very complex networks, and those networks are changing all the time: divisions, mergers, ownership changes, agreement changes, cooperation with other entities, life-cycles, etc.

324
325
326
327

Here we can note the difference between owners, agreements and members. In reality ownerships agreements and memberships cause very complex networks, and those networks are changing all the time: divisions, mergers, ownership changes, agreement changes, cooperation with other entities, life-cycles, etc.

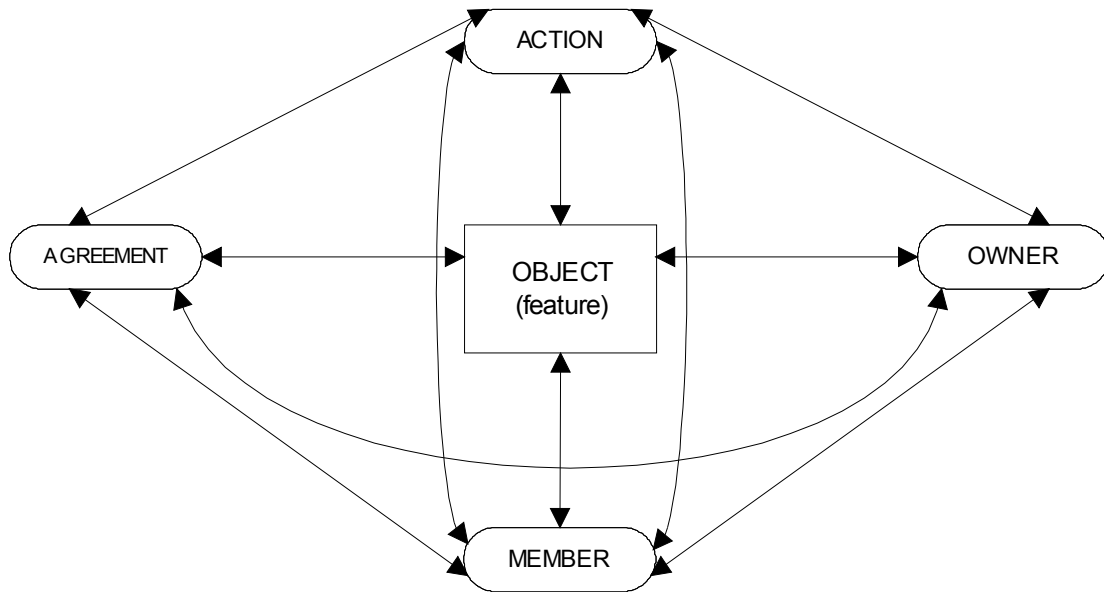
328
329
330
331

Question: Can different APIs take care of changes with ownership, agreement(s) and membership?

332
333
334
335
336

Here we can note that ownership, agreement and membership are interlinked in different ways. Generally speaking average usage of a system means an unique combination of ownership, agreement and membership. When everything works fine there are not problems.

However changes with ownership, agreement and membership can result difficult situations.



337
338
339
340
341
342
343

Proposal: There could be some considerations for assessing possible / future changes in ownerships, agreements and memberships.

Next table gives us some possibilities for assessing possibilities for open solutions and closed solutions.

	Owner? Member? Agreement?	OPEN	CLOSED
1. Device / Machinery			
2. Operating system			
3. Program(s)			
4. Data models / Conceptual models			
5. Documents			
6. Databases			
7. Communications			
8. Retrieve / Interface / Display			
9. Add / Interface / Display			
10. Remove / Interface / Display			
11. Change / Interface / Display			

344

345 In practical reality, different (digital) objects are used by different actors, and there can be several
 346 interlinked agreements, ownerships and memberships. When everything is working well different
 347 interlinked agreements, ownerships and memberships do not constitute any problems. However,
 348 different changes during the life-cycle of an information can be based on interlinked agreements,
 349 ownerships and memberships.

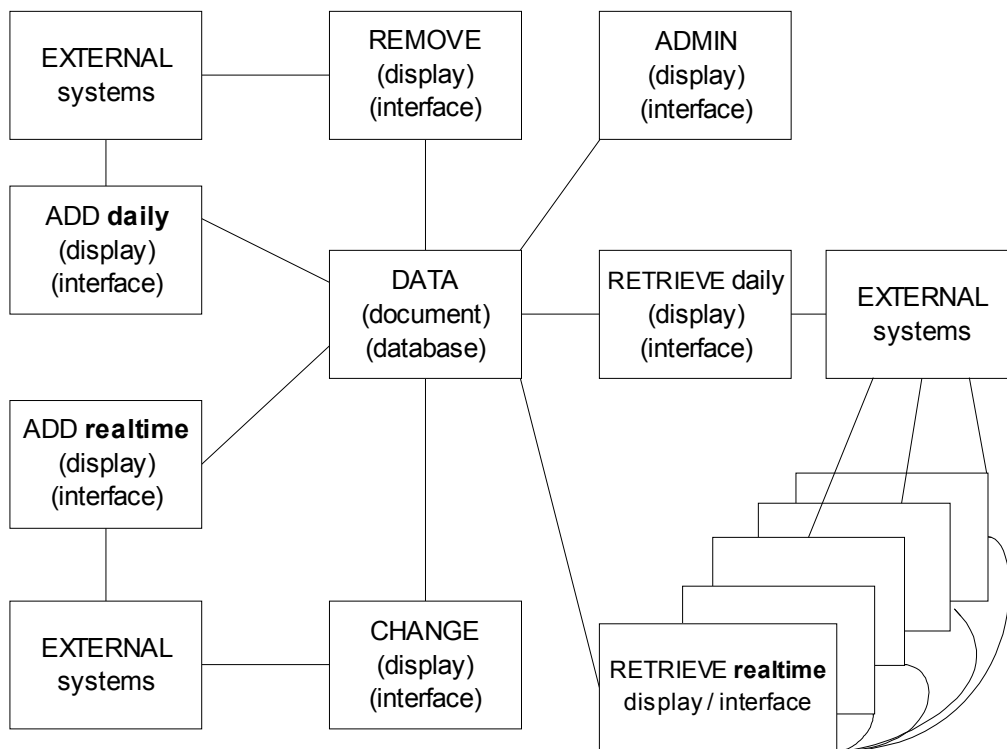
350
 351 **Different timeframes for different information systems**

352
 353 Like the next figure indicates, there is a difference between realtime systems and other systems.

354
 355 **Proposal: There can be different realtime systems, and the need for different realtime**
 356 **systems could be assessed.**

357
 358 **Proposal: There can be different systems with other timeframes, and the need for**
 359 **systems should with different timeframes could be assessed**

360



361

362

363 In some cases there is a clear need for different replicated information systems. There may a need
 364 for several/different interfaces based on timeframes in systems.

365

366 **Proposal: Replicating some systems could be assessed critically.**

367

368 **Proposal: Possibly there could be several/different interfaces based on timeframes in**
 369 **different systems.**

370

371 An example is the difference between desk-top computers and mobile devices. It may be feasible to
 372 provide different interfaces for desk-top computers and mobile devices.

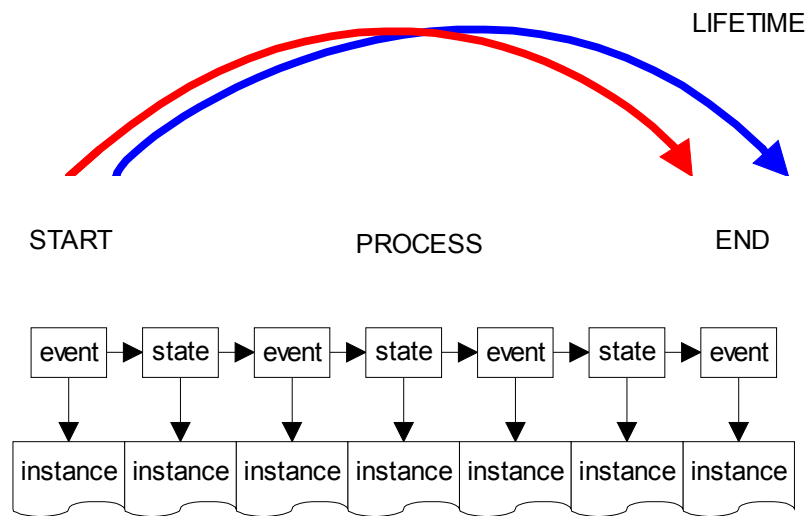
373

374 **Event, states, processes and lifetime**

375

376 Systems can be terminated in some timeframes. Also some new systems can be created to have
 377 more functions than the previously terminated systems. With a state-level contact point these
 378 integration solutions can be consolidated in different state-level timeframes.

379



380

381

382 **Proposal: There could be some efforts to cataloguing state-level systems and federal**
 383 **systems.**

384

385 **Proposal: Based on the mentioned catalogue there could be some development efforts**
 386 **in the near future and in distant future.**

387

388 It can be also noted, that different state systems have different life-cycles. One option is naturally
 389 enforcing different open standards, which could be implemented gradually to all relevant
 390 information systems. These efforts can mean work for several years in the near future and in the
 391 distant future. Then we can go back to different APIs.

392

393 **Proposal: Based on previous proposals could different OPEN APIs could be gradually**
 394 **implemented in different systems.**

395

396 **Different requirements**

397

398 I have advocated following solution as the maximum solution for different information systems:

399

400

- 401 * public sector institute owns the machinery and processor of the information system
- 402 * the machinery and processor are based on relevant open standards
- 403 * the operating system is based on an open-source solution
- 404 * public sector institute owns the source code of the information system
- 405 * public sector institute owns the database of the information system
- 406 * the database is based on open-source solution and on relevant open standards
- 407 * public sector institute owns all data in the information system.

408
409 **Note: It is possible, that the maximum solution is not implemented for different**
410 **reasons.**

411
412 Here we can note, that the IT platform can be realised with different technologies – some of those
413 technologies are closed and open.

414
415 One option is to create a detailed roadmap for different phases of the proposed IT platform. With
416 this roadmap it could be easier to develop the proposed IT platform.

417
418 **Proposal: Detailed roadmap could be created.**

419
420 **Proposal: Detailed roadmap could part of more technical and more detailed**
421 **consultation.**

422
423 **Note: In some consultations I have proposed a roadmap, which could gradually move**
424 **to the previously explicated maximum solution for different information systems**

425
426 **Note: Actually enforcing different open technologies in different systems can take years**
427 **since there are different commitments with current/different systems.**

428
429 **Creating highly readable documents for different purposes**

430
431 In previous consultations I have advocated creation of highly readable documents – especially
432 different legal documents. Legal texts in many cases can be presented with very readable text.

433
434 **Proposal: The Department could support work, which would develop highly readable**
435 **documents in different application fields (of net innovations) – e.g. licences, (standard)**
436 **agreements, user documentation, technical references, etc.**

437
438 **An example ² of readable documents / Creative Commons**

439
440 Here we can have an example of readable documents, i.e. Creative Commons. On a dedicated web
441 page ³ it is possible to choose a licence. Based on selections there can be different figures of
442 different licences.

2 <http://creativecommons.org/>, Creative Commons

3 <http://creativecommons.org/choose/>, Creative Commons – Choosing a licence



443
444 <http://creativecommons.org/licenses/by-nc-nd/4.0/>

445 <http://creativecommons.org/licenses/by-sa/4.0/legalcode>



447
448 <http://creativecommons.org/licenses/by-sa/4.0/>

449 <http://creativecommons.org/licenses/by/4.0/legalcode>

450
451 Like the links show there can be three levels for selecting a licence: a figure, short description and
452 finally the actual legal (complicated?) text.

453
454 **Proposal: All legal texts should be very readable.**

455
456 **Proposal: There can be different ways for describing licences: e.g. a figure, short**
457 **description and actual legal text.**

458
459 **Organising more technical consultations?**

460
461 **Proposal: The Ministry could organise more technically oriented consultations based**
462 **on results of this consultation.**

463
464 One idea is distributing questionnaires for ⁴ different IT expert associations, and members of those
465 associations could assess different IT standard proposals. Nowadays a lot of questionnaires can be
466 distributed and answered using different electronic measures.

467
468 **Proposal: Part of the evaluation could be organising (electronic) questionnaires for**
469 **members of different stakeholder/expert associations based on the application field.**

470
471 The questionnaires can be very structured or very free-form. The advantage of very structured
472 questionnaire is naturally the ease of processing the results of an questionnaire. Answers to free-
473 form questionnaires can result a lot of documents, and their assessment can mean a lot of manual
474 processing.

475
476 **One example**

477
478 In the previous consultations I have used web feeds as an example.



480
481

4 <http://www.tivia.fi/in-english>, e.g. The Finnish Information Processing Association, FIPA (Tieto- ja viestintätekniiikan ammattilaiset ry)

482 To be precise, there are some standards for ⁵ web feeds: RSS 2.0 ⁶ standard and Atom ^{7 8} standards.
483 There are different systems, which comply with these example standards (RSS and Atom)
484 differently.

485

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

490

491

492

493 **Good luck!!!**

494

495 This opinion is quite limited. Hopefully, there are other constructive ideas presented in other
496 opinions. This remains to be seen.

497

498

499 Best Regards,

500

501

502 Jukka S. Rannila

503 citizen of Finland (Europe)

504

505 signed electronically

506

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

6 <http://www.rssboard.org/rss-specification>, RSS specification

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

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

507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551

ANNEX 1

I have constructed different opinions about different issues, and on the following web page are all written (PDF files) opinions:

<http://www.jukkarannila.fi/lausunnot.html>

I have constructed specifically opinions related to information systems – both in English and in Finnish.

Here is the list of opinions related to information systems

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 13: Final Committee Draft ISO/IEC FCD3 19763-2

http://www.jukkarannila.fi/lausunnot.html#nro_13

EN: Opinion 14: SFS discussion paper / SFS:n keskusteluasiakirja

http://www.jukkarannila.fi/lausunnot.html#nro_14

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

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

- 552 EN: Opinion 24: ISO/IEC JTC 1 / SC 34 / WGs 1, 4 and 5 in Helsinki 14-17 June 2010
553 http://www.jukkarannila.fi/lausunnot.html#nro_24
554
- 555 FI: Lausunto 29: Avoimen demokratian avoimen datan avaamisen detaljit (ADADAD)
556 http://www.jukkarannila.fi/lausunnot.html#nro_29
557
- 558 EN: Opinion 30: Internet Filtering
559 http://www.jukkarannila.fi/lausunnot.html#nro_30
560
- 561 FI: Lausunto 31: Terveystieteiden tietotekniikasta
562 http://www.jukkarannila.fi/lausunnot.html#nro_31
563
- 564 EN: Opinion 32: COMP/C-3/39.692/IBM - Maintenance services
565 http://www.jukkarannila.fi/lausunnot.html#nro_32
566
- 567 FI: Lausunto 33: Julkishallinnon tietoluovutusten periaatteet ja käytännöt
568 http://www.jukkarannila.fi/lausunnot.html#nro_33
569
- 570 EN: Opinion 34: REMIT Registration Format
571 http://www.jukkarannila.fi/lausunnot.html#nro_34
572
- 573 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
574 http://www.jukkarannila.fi/lausunnot.html#nro_37
575
- 576 FI: Lausunto 38: SAdE-ohjelman avoimen lähdekoodin toimintamallin luonnos
577 http://www.jukkarannila.fi/lausunnot.html#nro_38
578
- 579 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
580 http://www.jukkarannila.fi/lausunnot.html#nro_39
581
- 582 EN: Opinion 41: AT.39398: observations on the proposed commitments
583 http://www.jukkarannila.fi/lausunnot.html#nro_41
584
- 585 EN: Opinion 43: Publication of extracts of the European register of market participants
586 http://www.jukkarannila.fi/lausunnot.html#nro_43
587
- 588 EN: Opinion 45: About ICT standardisation
589 http://www.jukkarannila.fi/lausunnot.html#nro_45
590
- 591 EN: Opinion 46: Review of the EU copyright rules
592 http://www.jukkarannila.fi/lausunnot.html#nro_46
593
- 594 EN: Opinion 47: Sharing or collaborating with government documents
595 http://www.jukkarannila.fi/lausunnot.html#nro_47
596

- 597 FI: Lausunto 49: JSH 166 -suosituksen päivitys
598 http://www.jukkarannila.fi/lausunnot.html#nro_49
599
600 EN: Opinion 52: Trusted Cloud Europe Survey
601 http://www.jukkarannila.fi/lausunnot.html#nro_52
602
603 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
604 http://www.jukkarannila.fi/lausunnot.html#nro_53
605
606 EN: Opinion 54: Government Content Management System
607 http://www.jukkarannila.fi/lausunnot.html#nro_54
608
609 EN: Opinion 55: European Energy Regulation
610 http://www.jukkarannila.fi/lausunnot.html#nro_55
611
612 EN: Opinion 56: National Identity Proofing Guidelines
613 http://www.jukkarannila.fi/lausunnot.html#nro_56
614
615 FI: Lausunto 58: Puoluekokousaloitteet / 2010 ja 2014
616 http://www.jukkarannila.fi/lausunnot.html#nro_58
617
618 EN: Opinion 59: Green paper on mobile Health
619 http://www.jukkarannila.fi/lausunnot.html#nro_59
620
621 EN: Opinion 60: Cross-border inheritance tax problems within the EU
622 http://www.jukkarannila.fi/lausunnot.html#nro_60
623
624 EN: Opinion 61: European Register of Products Containing Nanomaterials
625 http://www.jukkarannila.fi/lausunnot.html#nro_61
626
627 FI: Lausunto 63: Helsingin kaupungin tietotekniikkaohjelmasta 2015-2017
628 http://www.jukkarannila.fi/lausunnot.html#nro_63
629
630 EN: Opinion 64: Corporate Social Responsibility - European Commission
631 http://www.jukkarannila.fi/lausunnot.html#nro_64
632
633
634

I have constructed different opinions about different issues, and on the following web page
are all written (PDF files) opinions:

<http://www.jukkarannila.fi/lausunnot.html>

637
638

639

640

ANNEX 2

641 DISCLAIMERS

642

643 Legal disclaimer:

644 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
645 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

646 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
647 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
648 actor making those actions.

649

650 Political disclaimer:

651 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and
652 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal
653 entity making law proposals.

654

655 These opinions are not meant to be extreme-right, moderate-right, extreme-centre⁹, moderate-centre, extreme-left or
656 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of
657 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or
658 worldwide politics.

659

660 These opinions are not meant to rally for a candidacy in any public election in any level.

661

662 Content of web pages:

663 This text may or may not refer to web pages. The content of those web pages is not responsibility of author of this
664 document. They are referenced on the date of this document. If referenced web pages are not found after the date when
665 this document is dated, that situation is not responsibility of the author. All changes done in the web pages this
666 document refers are sole responsibility of those organisations and individuals maintaining those web pages. All illegal
667 content found on the referred web pages is not on the responsibility of the author of this document, and producing that
668 kind content is not endorsed by the author of this document.

669

670 Use of broken English

671 This text is in English, but from a person, whose is not a native English-speaking person. Therefore the text may or may
672 not contain bad, odd and broken English, and can contain awkward linguistic solutions.

673

674 COPYRIGHT

675

676 This opinion paper is distributed under Creative Commons licence, to be specific the licence is "Attribution-
677 NonCommercial-NoDerivatives 4.0 International (CC BY-NC-ND 4.0)". The text of the licence can be obtained from
678 the following web page:

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

680 The English explanation is on the following web page:

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

682

683

684



9 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.