

10 October 2007

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## CONSULTATION ON THE CONSUMER SCOREBOARD

First of all it is great that there is this kind of public consultation on this important issue. And this kind of consultation is especially good in the spirit of Transparency Initiative.

Just to remind about Transparency Initiative <sup>1</sup> it should be noted that there has been a public consultation based on COM(2007)185 <sup>2</sup>. The answers of COM(2007)185 consultation <sup>3</sup> are publicly seen and I propose to follow actively the Transparency Initiative.

Commission is acting is doing important work with their antitrust activities and that work should be carried on. However, this relates many times to activities between companies even though some of these antitrust cases have direct impacts on consumers.

However consumers' side of market functioning must be taken care of. Since we can ascertain that market does not work optimally there must be transparent market research and market observance. In light of this claim this public consultation is highly important and it is therefore a pleasure to answer this questionnaire.

Annex 1 holds information of copyright, licence and disclaimer.

Best Regards,

Jukka Rannila  
citizen of Finland

signed electronically

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1 Transparency Initiative: [http://ec.europa.eu/transparency/index\\_en.htm](http://ec.europa.eu/transparency/index_en.htm)

2 The COM(2007)185 consultation: [http://ec.europa.eu/transparency/revision/index\\_en.htm](http://ec.europa.eu/transparency/revision/index_en.htm)

3 Answers to the COM(2007)185 consultation: [http://ec.europa.eu/transparency/revision/contributions\\_en.htm](http://ec.europa.eu/transparency/revision/contributions_en.htm).

10 October 2007

Public / World wide web

<b>2. Identification data</b>	
<b>Name of organisation</b>	<i>Jukka Rannila (private citizen)</i>
<b>Country of establishment of the Organisation</b>	<i>Finland</i>
<b>Questionnaire completed by (Name of person, position, contact details)</b>	<i>Jukka Rannila</i>
<b>Stakeholder group</b>	<input type="checkbox"/> Member States authority <input type="checkbox"/> NGO <input type="checkbox"/> Industry (please specify sector of operation) <input checked="" type="checkbox"/> Individual <input checked="" type="checkbox"/> Other,  <i>individual, free and critical thinker</i>
<b>Stated objectives of the organisation</b>	Observance of EU activities
<b>Address</b>	FI-60100 Seinäjoki Finland
<b>Website address (if available)</b>	
<b>Contact person</b>	
<b>Name</b>	<i>Jukka Rannila</i>
<b>Role in the organisation (compulsory)</b>	<input type="checkbox"/> Senior management <input type="checkbox"/> Management (middle/lower) <input type="checkbox"/> Strategy / policy function <input type="checkbox"/> Specialist / expert <input checked="" type="checkbox"/> Other, self-managed
<b>Size of your organisation</b>	
<b>Number of members</b>	<input type="checkbox"/> 1-49 <input type="checkbox"/> 50-99 <input type="checkbox"/> 100-149 <input type="checkbox"/> 150-199 <input type="checkbox"/> 200+ Other, <b>1 (me)</b>
<b>Organisation's geographical area of activities</b>	<input checked="" type="checkbox"/> Local <input type="checkbox"/> Regional <input type="checkbox"/> National <input type="checkbox"/> European <input type="checkbox"/> International Other, <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

10 October 2007

Public / World wide web

### 3. Monitoring

Part 3.1. seems to be missing from the questionnaire. If that was contained in the questionnaire then the mistake might be in the document format that was used in the questionnaire. In either case I can not answer to point 3.1.

3.2 Do you think indicators and benchmarks are sufficient to monitor consumer markets or do you have any other suggestions?

- Sufficient
- Not sufficient
- Neutral
- Don't know
- Other

In Finland we have National Consumer Research Centre<sup>4</sup> and one of its mission is to be information service.

Based on visit on National Consumer Research Centre's web pages there was not link to European Union consumer information databases. However, there was link to Conrid database which is aimed to gather and make information available about consumer research in the Nordic countries.

I might be wrong but I suppose that there could be need for European wide public database of consumer research. There might be that kind of European level database, but that was not linked in National Consumer Research Centre's web pages. If there was that kind of link then it was my carelessness.

Web search with term "european consumer database" in search engine [www.info.com](http://www.info.com)<sup>5</sup> does not lead to publicly funded European-wide consumer information and/or research database.

If this kind of European-wide consumer information and/or research database is already functioning I recommend better search engine optimisation<sup>6</sup> (SEO).

4 Based on Finnish legislation: 112/1990, 279/1990, 456/2000

5 The author of this document does not recommend searching with [www.google.com](http://www.google.com) since search engine [www.info.com](http://www.info.com) combines research results from 14 search engine providing better results and [www.google.com](http://www.google.com) being only one of those 14 search engines. Author recommends competition also in search engine market and also consumer choice in search engine market. However, decision of starting antitrust actions based on misuse of dominant market position are sole responsibility of Commission's Directorate General Competition. [http://ec.europa.eu/comm/competition/antitrust/overview\\_en.html](http://ec.europa.eu/comm/competition/antitrust/overview_en.html)

6 [http://en.wikipedia.org/wiki/Search\\_engine\\_optimization](http://en.wikipedia.org/wiki/Search_engine_optimization)

10 October 2007

Public / World wide web

**4. Tools and data**

4.1 Should the scoreboard aim to cover all the main categories of consumer expenditure or should it rather focus on covering a more limited range of categories but in more detail?

- Yes, main categories  
 No, limited number of categories in more detail

In this questionnaire the main categories are not explained or there is not link to description of those main categories which leads to using imagination instead of concrete facts. Therefore I recommend more careful planning of questionnaires and readability tests with persons who have not prior knowledge of consumer policy issues.

Since this is based on imagination I have to guess that there is certain amount of categories which are not described or linked here.

However, gathering information is considerably large task and also distributing is also considerably large task. The assumption here is that with the same effort it is possible to gather information of all main categories and therefore it is possible to distribute information of this larger categories.

However, the question is slightly misleading. Is it possible to have information of main categories in more detail? Since all sector of customer commerce are important I really don't see reason to exclude any category out of information distribution.

Like said before this answer is partly based on imagination since there was not clearer description of "main categories".

10 October 2007

Public / World wide web

**4.2 What are the most important market outcomes for consumers that should be monitored?**

- Prices
- Quality
- Choice
- Transparency of offers
- Consumer complaints
- Consumer satisfaction
- Consumer confidence
- Consumer empowerment (skills, assertiveness, education, information)
- Product safety
- Accidents and injuries
- Enforcement of consumer legislation
- Consumer-led innovation
- Switching costs

As a general note can be said that price is NOT normally the only way to have a (or is it THE) competitive advantage. Price probably will be followed but there should be other factors also.

Once again there is mishap in the questionnaire planning. All those factors are important and they should be monitored. However, there can be level of importance for those factors. As my personal valuation I think following order.

1. Product safety
2. Accidents and injuries
3. Enforcement of consumer legislation
4. Transparency of offers
5. Consumer complaints
6. Consumer satisfaction
7. Consumer confidence
8. Quality
9. Choice
10. Switching costs
11. Consumer empowerment (skills, assertiveness, education, information)
12. Consumer-led innovation
13. Prices

Information of product safety should be distributed in all possible means as soon as possible and as wide as possible.

10 October 2007

Public / World wide web

**4.3 What other kind of data should the consumer scoreboard include?**

There could be of course a free-form information field. Like some sort of general information of customer commerce information or analysis. This free-form information field can be also from every member state. Of course this means more work since somebody has to make the analysis and it is easier to distribute plain statistics.

Also information of ongoing class actions could be informative.

**4.4 Do you have any data that are collected regularly and could be used as input to the scoreboard**

No.

Of course one option is take part in consumer panels, omnibuses, etc. It should be easy to take part in and easy to get out. Of course statistical factors, etc. should be considered and planned.

10 October 2007

Public / World wide web

<b>5. Frequency, dissemination</b>
<b>5.1 How often should the consumer scoreboard be issued?</b>
<input checked="" type="checkbox"/> Every 6 months <input type="checkbox"/> Every 12 months <input type="checkbox"/> Every 24 months <input checked="" type="checkbox"/> Other,
See answer 5.2.
<b>5.2 How should the results of the consumer scoreboard be disseminated?</b>
There are many ways: <ul style="list-style-type: none"><li>- publications</li><li>- press releases</li><li>- web pages</li><li>- electronic mail mailing lists</li><li>- RSS feeds.</li></ul>
My assumption is that there will be year publications, etc. reports. These should be distributed in electronic form in relevant electronic information service(s). Then there are press releases but their problem is distortion of the message in the public media process. Therefore there has to be possibility to go to the unaltered information and therefore in current environment there has to be up-to-date web pages aligned with release of press releases. Electronic mailing lists are of course one option but their problem is general fear of releasing private information to electronic information services. But of course this one option.
Problem with the web pages is that generally speaking average person remembers only limited amount of web pages. Therefore it can be so that average person does not remember to go to the web pages every 6 months.
One interesting option is RSS feed since usage of RSS feeds does demand any kind of registration. The problem for information provider is that there is not knowledge who are reading those feeds. If an average person visits the consumer scoreboard web page and then subscribes to RSS feed the web can be “forgotten” until the next update is available.
However. Since this is meant to public information there should be following conditions: <ul style="list-style-type: none"><li>- public information should mean no registration</li><li>- public information should be in public electronic information service.</li></ul>
One interesting option there is with RSS feeds. Since they are meant to be read daily also there could be consumer scoreboard that is updating in shorter intervals than 6 months. But that is one option.

10 October 2007

Public / World wide web

**ANNEX 1**

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The English explanation is in the following web page:

<http://creativecommons.org/licenses/by-nd-nc/1.0/fi/deed.en>

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<sup>7</sup> Based on the Finnish three-party system there is phenomenon called extreme-centre in Finland.