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2 TO:

3 Unit G.1: Data Policy and Innovation

4 Directorate-General for Communications Networks, Content and Technology (DG CNECT)

5 European Commission

6

7

8 **Ref. Ares(2020)3480073 – 02/07/2020**

9 **Legislative framework for the governance of common European data spaces**

10

11

12 First of all, a lot of thanks to Directorate-General for Communications Networks, Content and
13 Technology (DG CNECT) for organising this important consultation.

14

15 This opinion represents an opinion of an individual citizen, not any legal entity.

16

17 This opinion does not contain:

18 – any business secrets

19 – any trade secrets

20 – any confidential information.

21

22 This opinion is public.

23 PDF file of this opinion can be added to a relevant web page.

24

25 Annex 1 holds information about previous consultations at the European Union level.

26 Annex 2 holds information about copyright, licence and disclaimers.

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30 Best Regards,

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34 Jukka S. Rannila

35 citizen of Finland

36

37 signed electronically

38

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40 [Continues on the next page]

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43

44 About previous consultations / Repeating several issues

45

46 Annex 1 holds information about previous consultations. I have repeated the same issues several
47 times and previous consultation documents can be assessed critically. Different units of the
48 European Commission already know something about my previous opinions.

49

50 Highlighting only some issues

51

52 This opinion does not handle all issues which are mentioned on the consultation document. I have
53 presented different issues to different units of the European Commission. Generally speaking many
54 proposals are already implemented and therefore I don't present all possible issues based on this
55 consultation.

56

57 Consultation document is technologically neutral and does not mentioning company names

58

59 It is fully understandable that the consultation document is technologically neutral. It is also fully
60 understandable that the consultation document does not mention specific company names.

61

62 (1) One object and policy option

63

64 One object and policy option is can be presented here.

65

66 **Make more data held by the public sector usable for research and innovative uses**
67 **(development of new products and services) where the use is conditional on the respect**
68 **of rights of others (right to the protection of personal data, intellectual property rights,**
69 **including trade secrets, and other commercially confidential data).**

70

71 (1) Here I can present some issues.

72

73 **Sanitization of classified information could be mentioned here.**

74 **There could be some guidelines for sanitization of classified information.**

75 **There could be some guidelines for assessing need for sanitization of classified**
76 **information.**

77

78 (2) One object and policy option.

79

80 One object and policy option is can be presented here.

81

82 **Enhancing data use in the society and economy by lowering transaction costs, resulting**
83 **from technical barriers, in particular those resulting from the lack of interoperability**
84 **and absence of generic standards for data sharing, but also from costs of establishing**
85 **data sharing from a legal and technical perspective.**

86

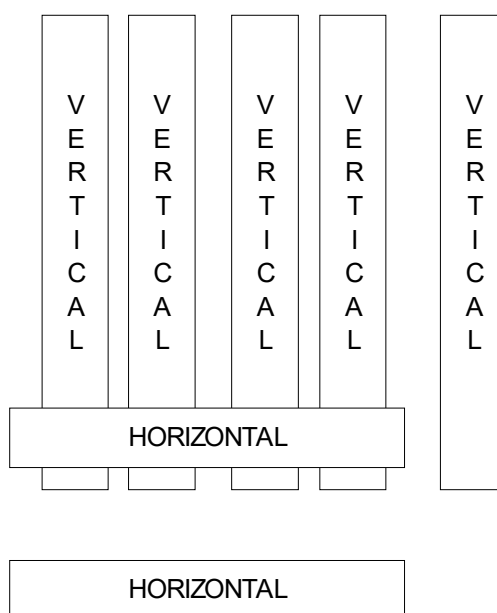
87

88 (2) Here I can present some issues:

- 89
- 90 • standards generally
 - 91 • open and horizontal standards
 - 92 • different information systems in member states and European Union
 - 93 • identifiers (ID) in different information systems
 - 94 • application programming interface (APIS).
- 95

96 **Favouring open standards / Favouring horizontal standards**

97



98
99

100 There are differences between horizontal and vertical standards. A simple example is naturally
101 email solutions. There are several vertical standards when creating technically email solutions. Then
102 there are horizontal standards which enable sending messages between technically different email
103 solutions.

104

105 **Proposal: There could be assessment of vertical and horizontal standards.**

106

107 **Proposal: Using horizontal standards could be favoured when creating different**
108 **information systems on the European Union level.**

109

110 Horizontal standards enables technological solutions which can work together. Horizontal standards
111 hides different complexities in information systems.

112

113 **Opinion: The number of redundant standardisation efforts should be minimal.**

114

115 **Proposal: There could be separation of horizontal standards and vertical standards.**

116

117

Proposal: There could be different standardisation efforts to horizontal standards and vertical standards.

118

119

120 Personally I have advocated using different horizontal standards. For example email standards
121 (horizontal) are implemented with very different technologies (vertical).

122

123 Here we can note some problems:

124

- 125 • some systems are based on **de-facto** standards

- 126 • some systems are based on **de-jure** standards

- 127 • there can be confrontations between **de-facto** and **de-jure** standards

- 128 • there can be a monopoly situation in some domain

- 129 • some standards may inhibit possible actions of some stakeholders

- 130 • there can be a standard war on some domains

- 131 • standards have different life-cycles

- 132 • systems have different life-cycles

- 133 • there can be mismatches between different life-cycles

- 134 • there can be failed standards

- 135 • there can be deprecated standards.

136

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

141

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

148

149 There are different standards setting organisations on the information technology field. One list ¹ of
150 these standards setting organisations is provided by ConsortiumInfo.org.

151

152 One warning can be said about standards setting organisations. All standards setting organisations
153 are not successes based on several factors and there can may irrelevant standards setting
154 organisations. Market situation on different vehicle markets varies a lot based on different factors.

155

**Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by
157 different standard setting organisations could be assessed carefully.**

158

159 Personally I have advocated using different horizontal standards. For example email standards

1 Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php

160 (horizontal) are implemented with very different technologies (vertical).

161

162 **Proposal: Governments should especially concentrate on horizontal standards.**

163

164 **Proposal: Some government agencies could apply for memberships of different**
 165 **standard setting organisations which develop especially horizontal standards.**

166

167 **Proposal: Government agencies should not be passive by-standers when different**
 168 **horizontal standards are developed.**

169

170 **Proposal: Government agencies could financially support development of horizontal**
 171 **standards.**

172

173 **Proposal: There could some guidance for using open horizontal standards on different**
 174 **application fields.**

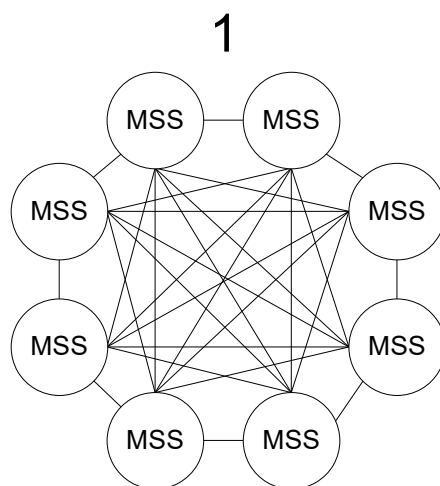
175

176 **EU-wide level?**

177

178 I have noted several times that different member state systems (MSS) can interlinked in many ways.
 179 This means that co-operation with European Union systems means a lot of work. This leads to the
 180 question of a European Contact Point (EUCP) for different member state systems (MSS).

181



MSS = Member State System

182

183

184

185 There are 28 member states (European Union) at the moment. In reality there are unique situations
 186 with information systems in different member states. In some cases information systems can be
 187 implemented based on complex system-to-system connections. Complex system-to-system
 188 connections means a lot of work when there are changes in some systems.

189

190 Naturally there could be direct contacts between different member state systems (MSS) and
 191 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large

192 number of different member state system. Based on 27 member state systems there could be
 193 hundreds of connections:

194

195 $27 \times 10 = 270 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

196 $27 \times 20 = 540 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

197 $27 \times 30 = 810 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

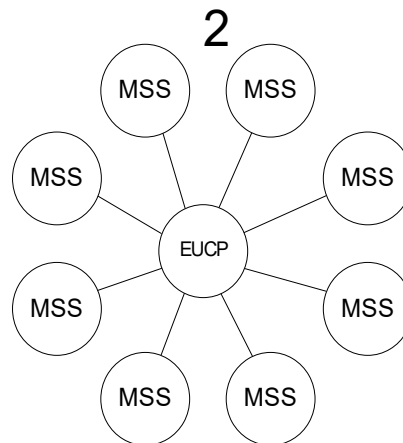
198

199 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 200 there can be member state contact points (MCP). Then there can be some hierarchy between
 201 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
 202 with member state systems in member states. Therefore member state contact points (MCP) can
 203 reduce the complexity with European Union contact point (EUCP)

204

205 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 206 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

207



208

MSS = Member State System, EUCP = European Contact Point

209

210

211 In the current situation, European Union member states (and some co-operation states) have their
 212 own internal IDs for several information systems. Also, the members states organised as a
 213 federation have their own internal problems with state-level IDs.

214

215 Based on those calculations there could be a lot of direct connections to the European contact point.
 216 Number of those connections can be overwhelming. The situation between member states can vary
 217 in many ways. So there can different and unique systems between member states.

218

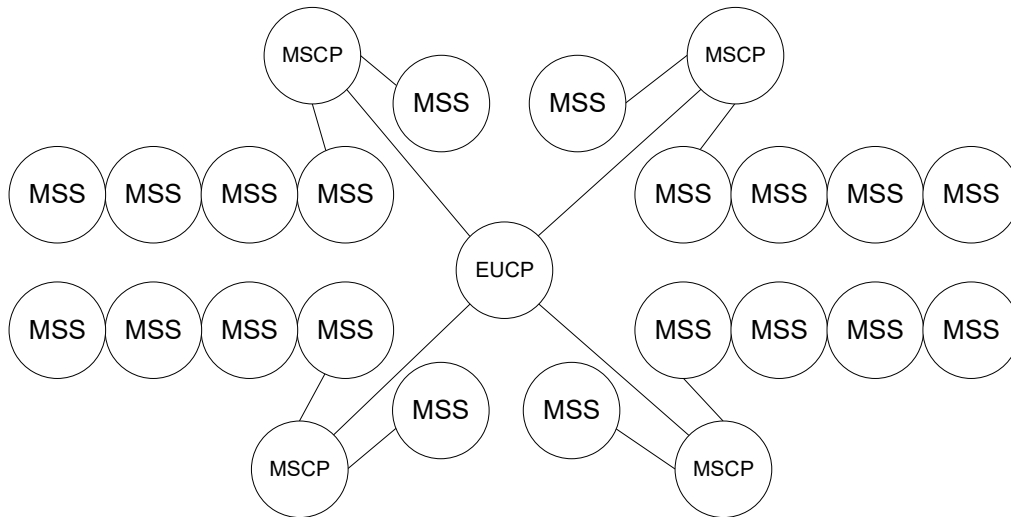
219 On the other hand, there are some working examples of joined or federated EU-wide registers.
 220 However, the amount of administration and needed legally binding agreements is considerable.

221

222 **Proposal : There could be one information system (member state contact point, MSCP)**
 223 **on member state level.**

224

3



MSS = Member State System

MSCP = Member State Contact Point, EUCP = European Contact Point

225

226

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228

229 The solution can be, that member states have own Member State Contact Points (MSCP) and
 230 different state level systems are combined gradually. Then the member state system IDs can be used
 231 in the European Contact Point (EUCP).

232

233 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 234 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

235

236 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 237 there can be member state contact points (MCP). Then there can be some hierarchy between
 238 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
 239 with member state systems in member states. Therefore member state contact points (MCP) can
 240 reduce the complexity with European Union contact point (EUCP).

241

242 **Proposal: Different member state systems could be consolidated based on limited**
 243 **number system-to-system connections.**

244

245 **Proposal: There could be some time frames for consolidating different member state**
 246 **systems (MSS) with member state contact points (MSCP).**

247

248 **Proposal: There could be some time frames for consolidating member state contact**
 249 **points (MSCP) with the European Union contact point (EUCP).**

250

251 **Proposal: One information system (member state contact point, MSCP) on member**
 252 **state level could handle system-to-system connections with the European Union level**

253 **(European contact point).**

254

255 **Proposal: There could be some serious work for developing a standardised member**
256 **state contact point (MSCP).**

257

258 **Proposal: After developing a standardised member state contact point (MSCP)**
259 **different member states could consolidate their systems (MSS ↔ MSCP).**

260

261 **Proposal: European Union contact point (EUCP) and member state contact points**
262 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European**
263 **Union level.**

264

265 Naturally we have to note that developing a standardised member state contact point (MSCP) means
266 more work. On the other hand a standardised member state contact point (MSCP) could handle
267 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
268 states may have more systems than other member states. We have to note that there are different
269 systems based on several technological solutions.

270

271 **About different identifiers (ID)**

272

273 Developing a standardised member state contact point (MSCP) means some work to be done. Here
274 we can note that there will be several *identifiers* when developing new systems and maintaining
275 current systems (EUCP ↔ MSCP).

276

277 I have proposed several times to use *open and public identifiers* when developing different
278 information system.

279

280 **More and more new identifiers (ID)**

281

282 In previous consultations there has been discussion about different identifiers (ID) in different
283 information systems. It can be noted from the previous opinions that there will be several and
284 different identifiers (ID) for different levels.

285

286 Examples of these identifiers (ID) are following:

287

- 288 1) Facebook ID for an individual person
- 289 2) Facebook ID for the individual updates of individuals
- 290 3) Data Universal Numbering System (D-U-N-S)
- 291 4) Reuters instruments codes (RICs)
- 292 5) Social security code for individual citizens in the European Union member states
- 293 6) Business identity code for a company in an European Union member state
- 294 7) Value added tax code for a company in an European Union member state.

295

296 The examples of private identifiers (Facebook IDs, Data Universal Numbering System (D-U-N-S),
297 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand

298 of using identifiers (ID) from privately owned information systems.

299

300 **Proposal: There could be a systematic review of different identifiers (ID) on different**
301 **levels.**

302

303 **Proposal: Possible systematic review of different identifiers (ID) should assess different**
304 **situations.**

305

306 Different information systems have also internal identifiers (ID) and external identifiers (ID) for
307 (possible) public usage. The added value for different stakeholders is provided by combination of
308 different identifiers (ID) in a specific information system.

309

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

312

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

316

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

318

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

322

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

324

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

326

327 In the European Union there has been different anti-trust cases which are related to different private
328 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
329 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

330

331 **More new identifiers (ID)?**

332

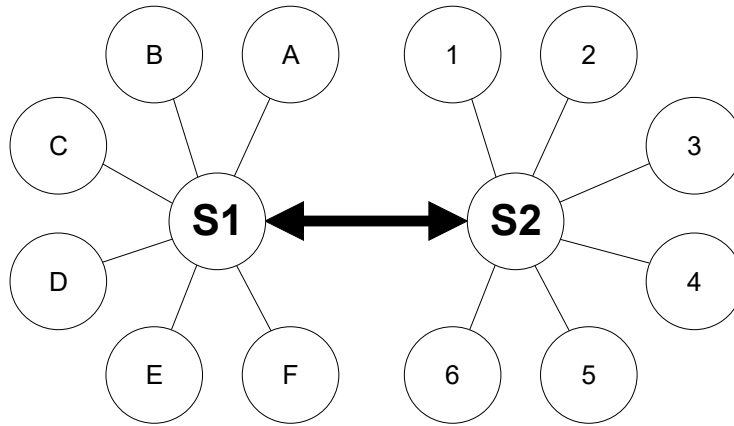
333 The current reality is, that there will be more and more IDs, since digitalisation of different areas
334 will result new IDs and/or combination of new and old IDs.

335

336 The creation YET another public ID is not always organised by the European Union, and in some
337 cases the European Union (and member states) just have to accept the reality of some of those
338 public IDs – in some cases even private IDs are the norm. The Reuters Instruments Codes (RICs) is
339 an example of a near monopoly situation, and some of current private IDs might constitute (near)
340 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
341 General, and it will be interesting to see possible new cases related to private IDs.

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Note: Digitalisation of everything means more identifiers (ID).

Note: All new identifiers (ID) mean more work for developing existing and new informations systems.

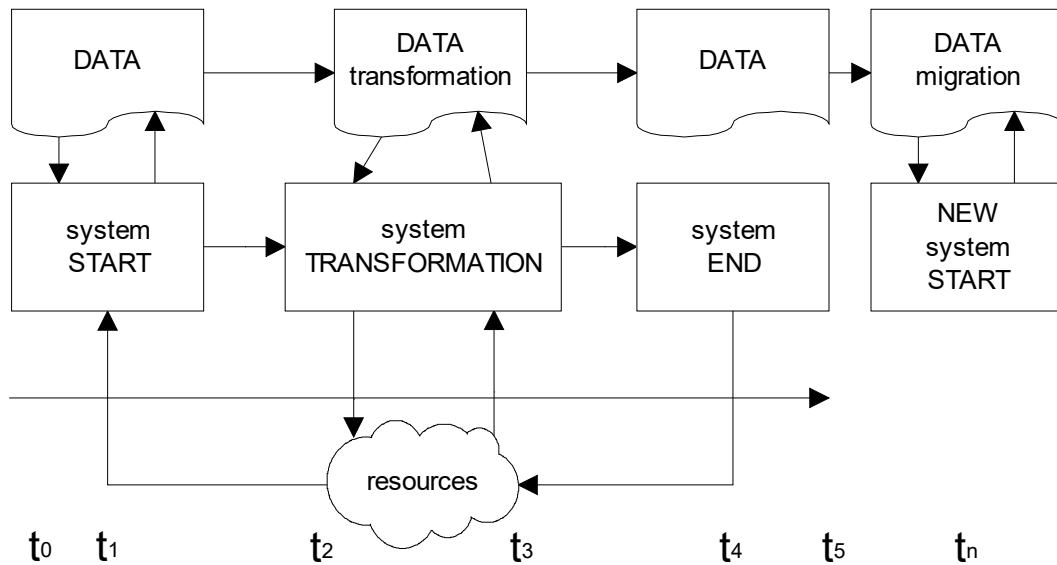
Note: There can be new stakeholder groups in the near/distant future which mean more identifiers (ID).

Assessing different application programming interface (APIS) / System timeline

There can several APIs when using different information systems.

The natural problem with APIs is timeline of different systems which implement different APIs. There can be new and old systems which implement different APIs.

[Continues on the next page]



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Proposal: Different information systems (EU-wide systems and member state systems) could be assessed based on informations system timelines.

Proposal: Different information systems (EU-wide systems and member state systems) could be assessed based on implementation of different APIs.

Proposal: There could be some assessments of different member state systems.

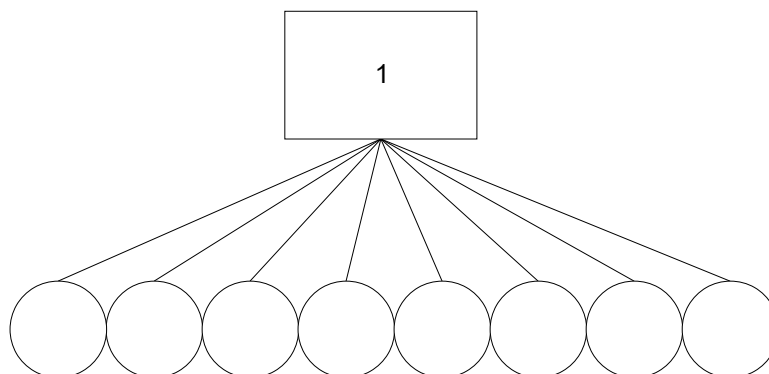
Note: Lifetime of different systems varies.

Note: Possibly it is not possible to consolidate all possible systems at the same time.

Proposal: There could be some timetable for consolidating different systems, i.e. cooperation between member states systems and European Union systems.

Here can be noted that there can several APIs implemented in different information systems.

[Continues on the next page]



385
386

387 One issue can be different versions of APIs. Based on timelines of different systems there can be
388 different API versions in use.

389

390 **Proposal: Different API versions could be assessed very carefully.**

391

392 Based on previous issues it can be noted that in some cases an older system can implement only
393 some versions of different APIs.

394

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

396



397
398

399 I have advocated usage of web feeds² on several previous opinion documents. Actually there are
400 two standards for web feeds: RSS^{3 4} and Atom^{5 6 7}.

401

402 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
403 **informations systems..**

404

405 **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
406 **time) information for different stakeholder(s) (communities).**

407

408 **Proposal: There can be different web feeds (RSS and/or Atom) for different**
409 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
410 **solution.**

411

2 https://en.wikipedia.org/wiki/Web_feed

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

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

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

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

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

412 **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

413

414 It can be easier to create web feeds in different information systems since web feeds enable
415 connections without direct system-to-system connections.

416

417 It can be noted, that different back-office systems (with a wide variety of different technologies) can
418 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
419 kind solutions front-office systems don't need direct system-to-system communications with back-
420 office systems.

421

422

423

424 **Good luck!!!**

425

426 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
427 opinions. This remains to be seen.

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432 [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 European Commission. General page to all consultations – both in English and in Finnish:

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

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

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

- 478 EN: Opinion 19: Official Acknowledgement by the Commission
479 http://www.jukkarannila.fi/lausunnot.html#nro_19
480
- 481 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
482 http://www.jukkarannila.fi/lausunnot.html#nro_20
483
- 484 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
485 http://www.jukkarannila.fi/lausunnot.html#nro_21
486
- 487 EN: Opinion 23: Public consultation on the review of the European Standardisation System
488 http://www.jukkarannila.fi/lausunnot.html#nro_23
489
- 490 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
491 http://www.jukkarannila.fi/lausunnot.html#nro_27
492
- 493 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
494 http://www.jukkarannila.fi/lausunnot.html#nro_28
495
- 496 EN: Opinion 30: Internet Filtering
497 http://www.jukkarannila.fi/lausunnot.html#nro_30
498 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
499
- 500 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
501 http://www.jukkarannila.fi/lausunnot.html#nro_32
502
- 503 EN: Opinion 34: REMIT Registration Format
504 http://www.jukkarannila.fi/lausunnot.html#nro_34
505 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
506
- 507 EN: Opinion 35: Exploiting the employment potential of the personal and household services
508 http://www.jukkarannila.fi/lausunnot.html#nro_35
509
- 510 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
511 http://www.jukkarannila.fi/lausunnot.html#nro_37
512
- 513 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
514 http://www.jukkarannila.fi/lausunnot.html#nro_39
515
- 516 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
517 http://www.jukkarannila.fi/lausunnot.html#nro_40
518
- 519 EN: Opinion 41: AT.39398: observations on the proposed commitments
520 http://www.jukkarannila.fi/lausunnot.html#nro_41

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

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

- 521
522 EN: Opinion 42: Opening up Education
523 http://www.jukkarannila.fi/lausunnot.html#nro_42
524
525 EN: Opinion 43: Publication of extracts of the European register of market participants
526 http://www.jukkarannila.fi/lausunnot.html#nro_43
527 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
528
529 EN: Opinion 44: Evaluation policy guidelines
530 http://www.jukkarannila.fi/lausunnot.html#nro_44
531
532 EN: Opinion 45: About ICT standardisation
533 http://www.jukkarannila.fi/lausunnot.html#nro_45
534
535 EN: Opinion 46: Review of the EU copyright rules
536 http://www.jukkarannila.fi/lausunnot.html#nro_46
537
538 EN: Opinion 51: European Area of Skills and Qualifications
539 http://www.jukkarannila.fi/lausunnot.html#nro_51
540
541 EN: Opinion 52: Trusted Cloud Europe Survey
542 http://www.jukkarannila.fi/lausunnot.html#nro_52
543
544 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
545 http://www.jukkarannila.fi/lausunnot.html#nro_53
546 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
547
548 EN: Opinion 55: European Energy Regulation
549 http://www.jukkarannila.fi/lausunnot.html#nro_55
550 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
551
552 EN: Opinion 59: Green paper on mobile Health
553 http://www.jukkarannila.fi/lausunnot.html#nro_59
554
555 EN: Opinion 60: Cross-border inheritance tax problems within the EU
556 http://www.jukkarannila.fi/lausunnot.html#nro_60
557
558 EN: Opinion 61: European Register of Products Containing Nanomaterials
559 http://www.jukkarannila.fi/lausunnot.html#nro_61
560
561 EN: Opinion 64: Corporate Social Responsibility - European Commission
562 http://www.jukkarannila.fi/lausunnot.html#nro_64
563
564 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
565 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 566 EN: Opinion 68: European Network Code Stakeholder Committees
567 http://www.jukkarannila.fi/lausunnot.html#nro_68
568 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
569
- 570 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
571 http://www.jukkarannila.fi/lausunnot.html#nro_71
572 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
573
- 574 EN: Opinion 74: Enabling the Internet of Things
575 http://www.jukkarannila.fi/lausunnot.html#nro_74
576 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ¹⁰
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- 578 EN: Opinion 80: Mandatory Transparency Register
579 http://www.jukkarannila.fi/lausunnot.html#nro_80
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- 581 EN: Opinion 84: Revision of the European Interoperability Framework
582 http://www.jukkarannila.fi/lausunnot.html#nro_84
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- 584 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
585 http://www.jukkarannila.fi/lausunnot.html#nro_86
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- 587 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
588 http://www.jukkarannila.fi/lausunnot.html#nro_88
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- 590 EN: Opinion 89: BEREC Guidelines for net neutrality rules
591 http://www.jukkarannila.fi/lausunnot.html#nro_89
592 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
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- 594 EN: Opinion 93: Safety of apps and other non-embedded software
595 http://www.jukkarannila.fi/lausunnot.html#nro_93
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- 597 EN: Opinion 95: Targeted consultation on eForms
598 http://www.jukkarannila.fi/lausunnot.html#nro_95
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- 600 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
601 http://www.jukkarannila.fi/lausunnot.html#nro_97
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- 603 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
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- 606 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
607 Regulators. Recast
608 http://www.jukkarannila.fi/lausunnot.html#nro_99
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¹⁰ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 610 EN: Opinion 100: Protection of personal data (EU)
611 http://www.jukkarannila.fi/lausunnot.html#nro_100
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- 613 EN: Opinion 101: Governance of the Energy Union
614 http://www.jukkarannila.fi/lausunnot.html#nro_101
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- 616 EN: Opinion 102: Smart Wearables
617 http://www.jukkarannila.fi/lausunnot.html#nro_102
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- 619 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
620 (ENISA)
621 http://www.jukkarannila.fi/lausunnot.html#nro_106
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- 623 EN: Opinion 108: Single Digital Gateway
624 http://www.jukkarannila.fi/lausunnot.html#nro_108
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- 626 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
627 http://www.jukkarannila.fi/lausunnot.html#nro_110
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- 629 EN: Opinion 111: Interoperability of information systems for migration and security
630 http://www.jukkarannila.fi/lausunnot.html#nro_111
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- 632 EN: Opinion 113: Transform of health and care
633 http://www.jukkarannila.fi/lausunnot.html#nro_113
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- 635 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
636 Internet
637 http://www.jukkarannila.fi/lausunnot.html#nro_114
638 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
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- 640 EN: Opinion 118: Fake news and online disinformation
641 http://www.jukkarannila.fi/lausunnot.html#nro_118
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- 643 EN: Opinion 119: European Social Security Number
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- 646 EN: Opinion 120: European Labour Authority
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- 649 EN: Opinion 121: 2nd Data Package
650 http://www.jukkarannila.fi/lausunnot.html#nro_121
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- 652 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
653 Cybersecurity Research and Competence Centre
654 http://www.jukkarannila.fi/lausunnot.html#nro_122

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656 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
657 THE COUNCIL on the re-use of public sector information (recast)
658 http://www.jukkarannila.fi/lausunnot.html#nro_123
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- 660 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
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- 663 EN: Opinion 128: Summertime arrangements
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- 666 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
667 http://www.jukkarannila.fi/lausunnot.html#nro_129
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- 669 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
670 http://www.jukkarannila.fi/lausunnot.html#nro_132
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- 672 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
673 ("eForms")
674 http://www.jukkarannila.fi/lausunnot.html#nro_133
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- 676 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
677 UCC
678 http://www.jukkarannila.fi/lausunnot.html#nro_134
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- 680 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
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- 683 EN: Opinion 141: Farm Accountancy Data Network
684 http://www.jukkarannila.fi/lausunnot.html#nro_141
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- 686 EN: Opinion 142: Horizon Europe (two consultations)
687 http://www.jukkarannila.fi/lausunnot.html#nro_142
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- 689 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
690 (evaluation)
691 http://www.jukkarannila.fi/lausunnot.html#nro_144
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- 693 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
694 http://www.jukkarannila.fi/lausunnot.html#nro_146
695 NOTE: Organised by the European Committee for Standardization (CEN)
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- 697 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
698 http://www.jukkarannila.fi/lausunnot.html#nro_147
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- 700 EN: Opinion 152: Revision of the Non-Financial Reporting Directive
701 http://www.jukkarannila.fi/lausunnot.html#nro_152
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- 703 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
704 http://www.jukkarannila.fi/lausunnot.html#nro_154
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- 706 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
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708 http://www.jukkarannila.fi/lausunnot.html#nro_156
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- 710 EN: Opinion 159: EU competition law - market definition notice (evaluation)
711 http://www.jukkarannila.fi/lausunnot.html#nro_159
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- 713 EN: Opinion 161: New Competition Tool ('NCT')
714 http://www.jukkarannila.fi/lausunnot.html#nro_161
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- 716 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
717 platforms acting as gatekeepers
718 http://www.jukkarannila.fi/lausunnot.html#nro_162
719
720
721
722
723
- 724 My opinions to the previous and relevant consultations – there consultations were mostly organised
725 by the European Commission. General page to all consultations – both in English and in Finnish:
726 <http://www.jukkarannila.fi/lausunnot.html>
727
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- 730 [Continues on the next page]

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ANNEX 2

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