

1
2 TO:
3 European Commission
4
5
6 **Ref. Ares(2020)4118690 – 05/08/2020**
7 **Business Registers Interconnection System (BRIS)**
8
9
10 This opinion represents an opinion of an individual citizen, not any legal entity.

11
12 This opinion does not contain:
13 – any business secrets
14 – any trade secrets
15 – any confidential information.

16
17 This opinion is public.
18 PDF file of this opinion can be added to a relevant web page.

19
20 Annex 1 holds information about previous consultations at the European Union level.
21 Annex 2 holds information about copyright, licence and disclaimers.

22
23
24
25 Best Regards,

26
27
28
29 Jukka S. Rannila
30 citizen of Finland

31
32 signed electronically

33
34
35 [Continues on the next page]
36

37

38 About previous consultations / Repeating several issues

39

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

43

44 Highlighting only some issues

45

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

50

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

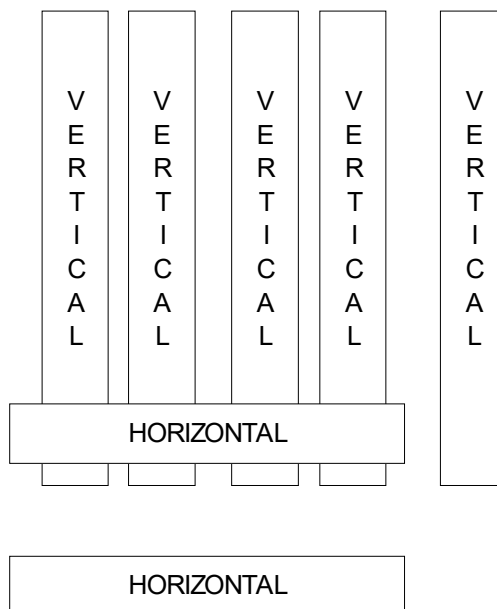
52

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

55

56 Favouring open standards / Favouring horizontal standards

57



58

59

60 There are differences between horizontal and vertical standards. A simple example is naturally
61 email solutions. There are several vertical standards when creating technically email solutions. Then
62 there are horizontal standards which enable sending messages between technically different email
63 solutions.

64

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

66

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

69

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

72

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

74

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

76

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

79

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

82

83 Here we can note some problems:

84

- 85 • some systems are based on **de-facto** standards
- 86 • some systems are based on **de-jure** standards
- 87 • there can be confrontations between **de-facto** and **de-jure** standards
- 88 • there can be a monopoly situation in some domain
- 89 • some standards may inhibit possible actions of some stakeholders
- 90 • there can be a standard war on some domains
- 91 • standards have different life-cycles
- 92 • systems have different life-cycles
- 93 • there can be mismatches between different life-cycles
- 94 • there can be failed standards
- 95 • there can be deprecated standards.

96

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

101

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

108

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

111

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

115

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

118

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

121

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

123

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

126

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

129

130 **Proposal: Government agencies could financially support development of horizontal**
131 **standards.**

132

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

135

136 **Assessing different application programming interface (APIS) / System timeline**

137

138 There can several APIs when using different information systems.

139

140 The natural problem with APIs is timeline of different systems which implement different APIs.

141 There can be new and old systems which implement different APIs.

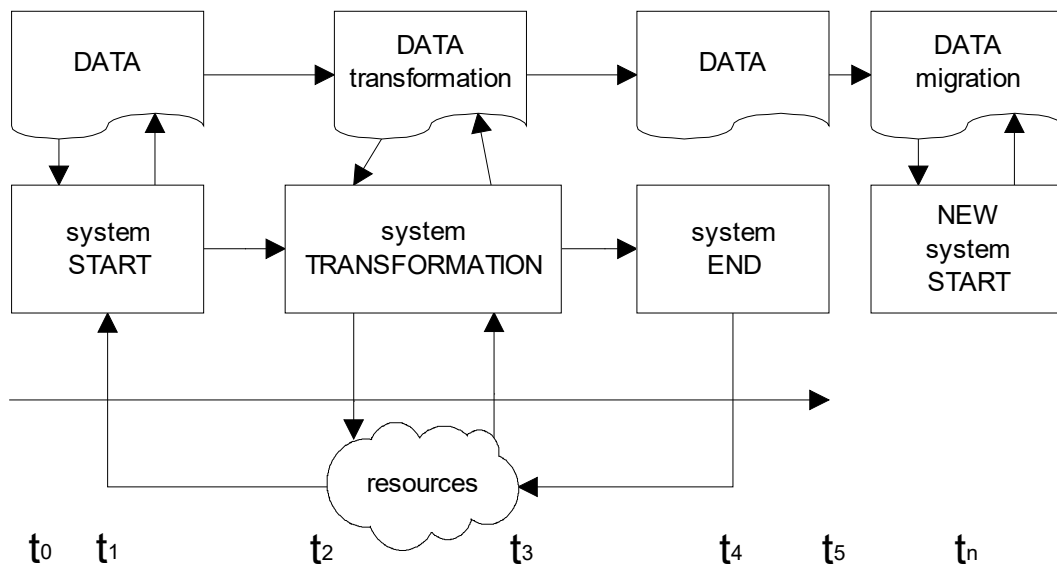
142

143

144 [Continues on the next page]

145

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



146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167

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.

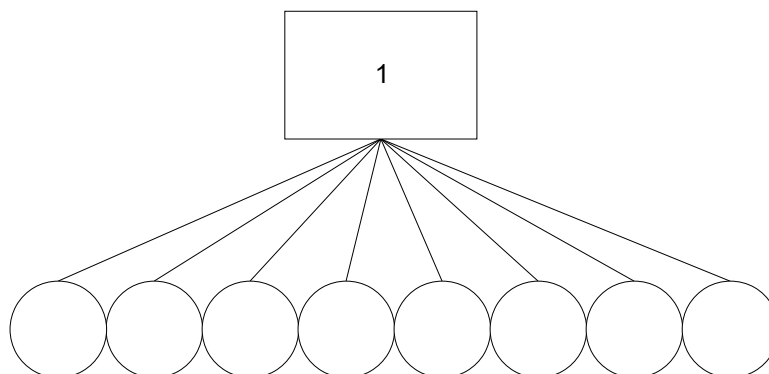
Note: Lifetime of different systems varies.

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]



168
169

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

172

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

174

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

177

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

179



180
181

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

184

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

187

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

190

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

194

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

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

196

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

199

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

204

205

206

207 **Good luck!!!**

208

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

211

212

213

214

215 [Continues on the next page]

216

217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261

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

- 262 EN: Opinion 19: Official Acknowledgement by the Commission
263 http://www.jukkarannila.fi/lausunnot.html#nro_19
264
- 265 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
266 http://www.jukkarannila.fi/lausunnot.html#nro_20
267
- 268 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
269 http://www.jukkarannila.fi/lausunnot.html#nro_21
270
- 271 EN: Opinion 23: Public consultation on the review of the European Standardisation System
272 http://www.jukkarannila.fi/lausunnot.html#nro_23
273
- 274 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
275 http://www.jukkarannila.fi/lausunnot.html#nro_27
276
- 277 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
278 http://www.jukkarannila.fi/lausunnot.html#nro_28
279
- 280 EN: Opinion 30: Internet Filtering
281 http://www.jukkarannila.fi/lausunnot.html#nro_30
282 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
283
- 284 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
285 http://www.jukkarannila.fi/lausunnot.html#nro_32
286
- 287 EN: Opinion 34: REMIT Registration Format
288 http://www.jukkarannila.fi/lausunnot.html#nro_34
289 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
290
- 291 EN: Opinion 35: Exploiting the employment potential of the personal and household services
292 http://www.jukkarannila.fi/lausunnot.html#nro_35
293
- 294 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
295 http://www.jukkarannila.fi/lausunnot.html#nro_37
296
- 297 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
298 http://www.jukkarannila.fi/lausunnot.html#nro_39
299
- 300 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
301 http://www.jukkarannila.fi/lausunnot.html#nro_40
302
- 303 EN: Opinion 41: AT.39398: observations on the proposed commitments
304 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)

- 305
306 EN: Opinion 42: Opening up Education
307 http://www.jukkarannila.fi/lausunnot.html#nro_42
308
309 EN: Opinion 43: Publication of extracts of the European register of market participants
310 http://www.jukkarannila.fi/lausunnot.html#nro_43
311 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
312
313 EN: Opinion 44: Evaluation policy guidelines
314 http://www.jukkarannila.fi/lausunnot.html#nro_44
315
316 EN: Opinion 45: About ICT standardisation
317 http://www.jukkarannila.fi/lausunnot.html#nro_45
318
319 EN: Opinion 46: Review of the EU copyright rules
320 http://www.jukkarannila.fi/lausunnot.html#nro_46
321
322 EN: Opinion 51: European Area of Skills and Qualifications
323 http://www.jukkarannila.fi/lausunnot.html#nro_51
324
325 EN: Opinion 52: Trusted Cloud Europe Survey
326 http://www.jukkarannila.fi/lausunnot.html#nro_52
327
328 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
329 http://www.jukkarannila.fi/lausunnot.html#nro_53
330 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
331
332 EN: Opinion 55: European Energy Regulation
333 http://www.jukkarannila.fi/lausunnot.html#nro_55
334 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
335
336 EN: Opinion 59: Green paper on mobile Health
337 http://www.jukkarannila.fi/lausunnot.html#nro_59
338
339 EN: Opinion 60: Cross-border inheritance tax problems within the EU
340 http://www.jukkarannila.fi/lausunnot.html#nro_60
341
342 EN: Opinion 61: European Register of Products Containing Nanomaterials
343 http://www.jukkarannila.fi/lausunnot.html#nro_61
344
345 EN: Opinion 64: Corporate Social Responsibility - European Commission
346 http://www.jukkarannila.fi/lausunnot.html#nro_64
347
348 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
349 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 350 EN: Opinion 68: European Network Code Stakeholder Committees
351 http://www.jukkarannila.fi/lausunnot.html#nro_68
352 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
353
354 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
355 http://www.jukkarannila.fi/lausunnot.html#nro_71
356 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
357
358 EN: Opinion 74: Enabling the Internet of Things
359 http://www.jukkarannila.fi/lausunnot.html#nro_74
360 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ¹⁰
361
362 EN: Opinion 80: Mandatory Transparency Register
363 http://www.jukkarannila.fi/lausunnot.html#nro_80
364
365 EN: Opinion 84: Revision of the European Interoperability Framework
366 http://www.jukkarannila.fi/lausunnot.html#nro_84
367
368 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
369 http://www.jukkarannila.fi/lausunnot.html#nro_86
370
371 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
372 http://www.jukkarannila.fi/lausunnot.html#nro_88
373
374 EN: Opinion 89: BEREC Guidelines for net neutrality rules
375 http://www.jukkarannila.fi/lausunnot.html#nro_89
376 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
377
378 EN: Opinion 93: Safety of apps and other non-embedded software
379 http://www.jukkarannila.fi/lausunnot.html#nro_93
380
381 EN: Opinion 95: Targeted consultation on eForms
382 http://www.jukkarannila.fi/lausunnot.html#nro_95
383
384 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
385 http://www.jukkarannila.fi/lausunnot.html#nro_97
386
387 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
388 http://www.jukkarannila.fi/lausunnot.html#nro_98
389
390 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
391 Regulators. Recast
392 http://www.jukkarannila.fi/lausunnot.html#nro_99
393

¹⁰ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 394 EN: Opinion 100: Protection of personal data (EU)
395 http://www.jukkarannila.fi/lausunnot.html#nro_100
396
- 397 EN: Opinion 101: Governance of the Energy Union
398 http://www.jukkarannila.fi/lausunnot.html#nro_101
399
- 400 EN: Opinion 102: Smart Wearables
401 http://www.jukkarannila.fi/lausunnot.html#nro_102
402
- 403 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
404 (ENISA)
405 http://www.jukkarannila.fi/lausunnot.html#nro_106
406
- 407 EN: Opinion 108: Single Digital Gateway
408 http://www.jukkarannila.fi/lausunnot.html#nro_108
409
- 410 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
411 http://www.jukkarannila.fi/lausunnot.html#nro_110
412
- 413 EN: Opinion 111: Interoperability of information systems for migration and security
414 http://www.jukkarannila.fi/lausunnot.html#nro_111
415
- 416 EN: Opinion 113: Transform of health and care
417 http://www.jukkarannila.fi/lausunnot.html#nro_113
418
- 419 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
420 Internet
421 http://www.jukkarannila.fi/lausunnot.html#nro_114
422 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
423
- 424 EN: Opinion 118: Fake news and online disinformation
425 http://www.jukkarannila.fi/lausunnot.html#nro_118
426
- 427 EN: Opinion 119: European Social Security Number
428 http://www.jukkarannila.fi/lausunnot.html#nro_119
429
- 430 EN: Opinion 120: European Labour Authority
431 http://www.jukkarannila.fi/lausunnot.html#nro_120
432
- 433 EN: Opinion 121: 2nd Data Package
434 http://www.jukkarannila.fi/lausunnot.html#nro_121
435
- 436 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
437 Cybersecurity Research and Competence Centre
438 http://www.jukkarannila.fi/lausunnot.html#nro_122

- 439
440 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
441 THE COUNCIL on the re-use of public sector information (recast)
442 http://www.jukkarannila.fi/lausunnot.html#nro_123
443
444 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
445 http://www.jukkarannila.fi/lausunnot.html#nro_125
446
447 EN: Opinion 128: Summertime arrangements
448 http://www.jukkarannila.fi/lausunnot.html#nro_128
449
450 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
451 http://www.jukkarannila.fi/lausunnot.html#nro_129
452
453 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
454 http://www.jukkarannila.fi/lausunnot.html#nro_132
455
456 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
457 ("eForms")
458 http://www.jukkarannila.fi/lausunnot.html#nro_133
459
460 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
461 UCC
462 http://www.jukkarannila.fi/lausunnot.html#nro_134
463
464 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
465 http://www.jukkarannila.fi/lausunnot.html#nro_139
466
467 EN: Opinion 141: Farm Accountancy Data Network
468 http://www.jukkarannila.fi/lausunnot.html#nro_141
469
470 EN: Opinion 142: Horizon Europe (two consultations)
471 http://www.jukkarannila.fi/lausunnot.html#nro_142
472
473 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
474 (evaluation)
475 http://www.jukkarannila.fi/lausunnot.html#nro_144
476
477 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
478 http://www.jukkarannila.fi/lausunnot.html#nro_146
479 NOTE: Organised by the European Committee for Standardization (CEN)
480
481 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
482 http://www.jukkarannila.fi/lausunnot.html#nro_147
483

- 484 EN: Opinion 152: Revision of the Non-Financial Reporting Directive
485 http://www.jukkarannila.fi/lausunnot.html#nro_152
486
- 487 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
488 http://www.jukkarannila.fi/lausunnot.html#nro_154
489
- 490 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
491 2021
492 http://www.jukkarannila.fi/lausunnot.html#nro_156
493
- 494 EN: Opinion 159: EU competition law - market definition notice (evaluation)
495 http://www.jukkarannila.fi/lausunnot.html#nro_159
496
- 497 EN: Opinion 161: New Competition Tool ('NCT')
498 http://www.jukkarannila.fi/lausunnot.html#nro_161
499
- 500 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
501 platforms acting as gatekeepers
502 http://www.jukkarannila.fi/lausunnot.html#nro_162
503
- 504 EN: Opinion 165: Legislative framework for the governance of common European data spaces
505 http://www.jukkarannila.fi/lausunnot.html#nro_165
506
507
508
- 509 My opinions to the previous and relevant consultations – there consultations were mostly organised
510 by the European Commission. General page to all consultations – both in English and in Finnish:
511 <http://www.jukkarannila.fi/lausunnot.html>
512
513
514
515 [Continues on the next page]

516

517

518 DISCLAIMERS

519

520 Legal disclaimer:

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

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

526

527 Political disclaimer:

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

531

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

536

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

538

539 Content of web pages:

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

546

547 Use of broken English

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

550

551 COPYRIGHT

552

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

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

557 The English explanation is on the following web page:

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

559



560

561

562 Tämän lausunnon lisenssi on Creative Commons -lisenssi, tarkemmin ottaen Nimeä-EiKaupallinen-EiMuutoksia 4.0
563 Kansainvälinen (CC BY-NC-ND 4.0). Lisenssin tekstit saa luettua seuraavilla www-sivuilla:

564

565 <https://creativecommons.org/licenses/by-nc-nd/4.0/deed.fi>

566 <https://creativecommons.org/licenses/by-nc-nd/4.0/legalcode.fi>