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2 TO:

3 Unit G.2: Interactive Technologies, Digital for Culture & Education

4 Directorate-General for Communications Networks, Content and Technology

5 European Commission

6

7 **Evaluation of the Recommendation on digitisation and online accessibility of cultural material**
8 **and digital preservation**

9

10 First of all, a lot of thanks to Directorate-General for Communications Networks, Content and
11 Technology (Unit G.2) for organising this important consultation.

12

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

14

15 This opinion does not contain:

16 – any business secrets

17 – any trade secrets

18 – any confidential information.

19

20 This opinion is public.

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

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23

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

25 Annex 2 holds information about disclaimers and copyright.

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27

28 Best Regards,

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32 Jukka S. Rannila

33 citizen of Finland

34

35 signed electronically

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39 [Continues on the next page]

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42 **About previous consultations / Repeating several issues**

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

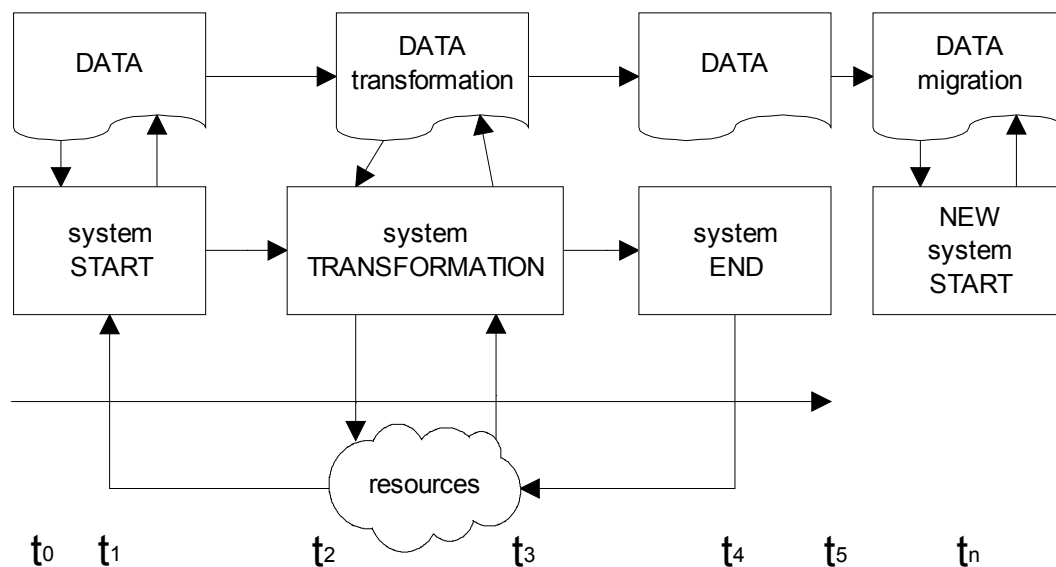
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48 **Assessing mostly the Europeana system(s) / Many proposals already implemented**

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50 This opinion is mostly assessing the Europeana system(s). Europeana system(s) already
51 implement(s) several issues which I have proposed based on previous consultations. Therefore
52 this opinion does not list all issues based on previous consultations.

53
54 **Assessing different application programming interface (APIS) / System timeline**

55
56 **Europeana system(s) – APIs**
57 <https://pro.europeana.eu/resources/apis/>

58
59 There are several APIs presented on the Europeana APIs site. The natural problem with APIs is
60 timeline of different systems which implement different APIs. There can be new and old systems
61 which implement different APIs.



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64
65 **Proposal: Different information systems (EU-wide systems and member state systems)**
66 **could be assessed based on informations system timelines.**

67
68 **Proposal: Different information systems (EU-wide systems and member state systems)**
69 **could be assessed based on implementation of different APIs.**

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

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Note: Lifetime of different systems varies.

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

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

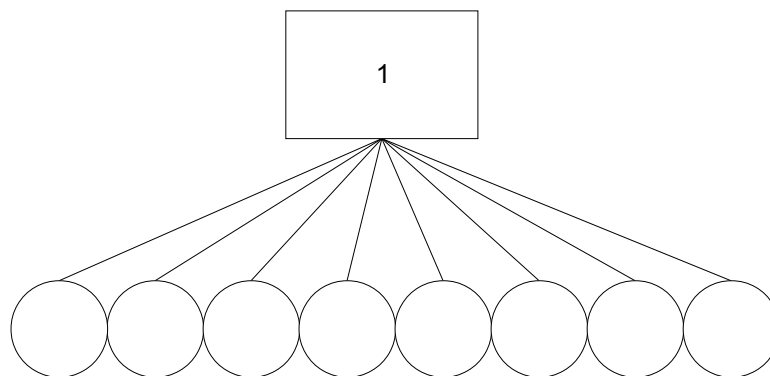
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Here can be noted that there can several APIs implemented in different information systems.

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

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Proposal: Different API versions could be assessed very carefully.

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

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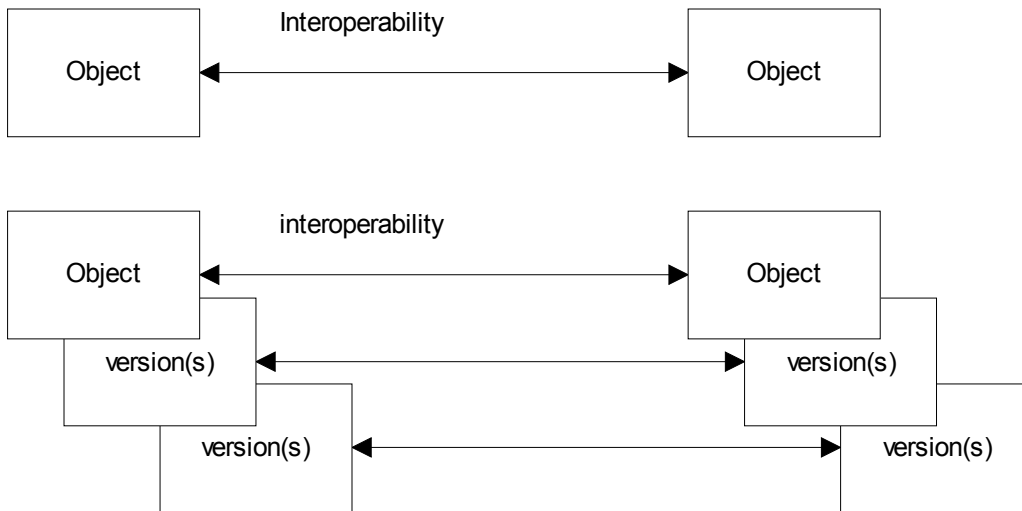
Interoperability between different versions

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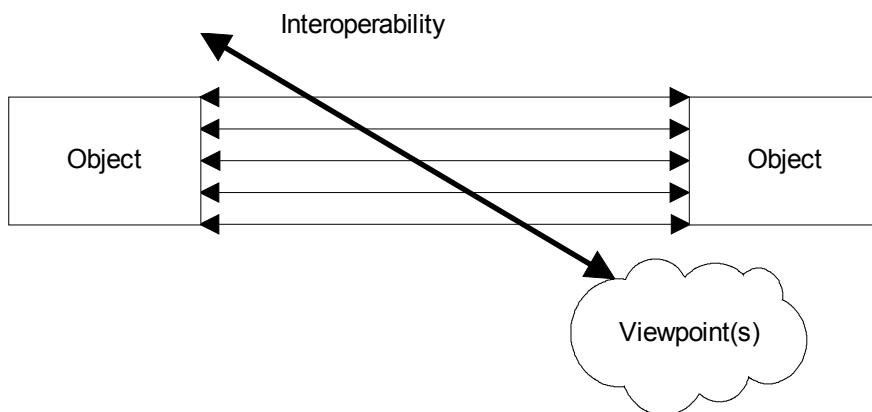
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One problem is naturally different versions of digital objects.

Proposal: There could be careful assessment of interoperability based on versions of digital objects.

It can be noted that different versions of digital objects may cause problems for interoperability.

One issue for interoperability are different viewpoints.



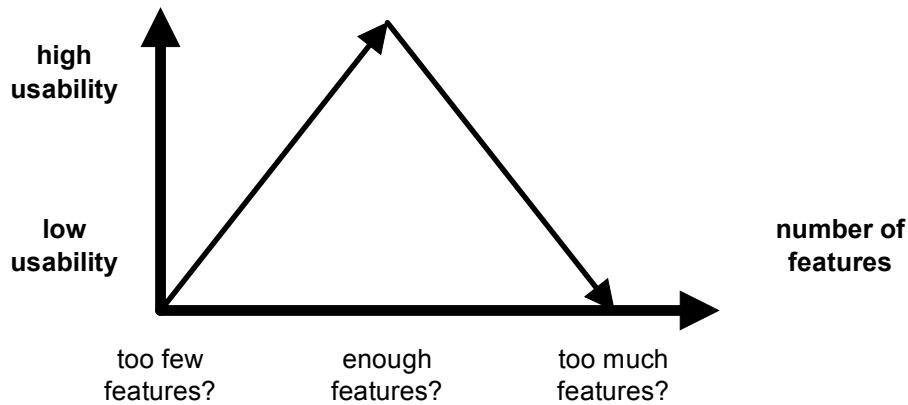
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Proposal: Different viewpoints for assessing interoperability could be evaluated very carefully.

It can be noted that there can be some new viewpoints in the future.

Features and requirements in different information systems

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119 One issue is assessment of different features.

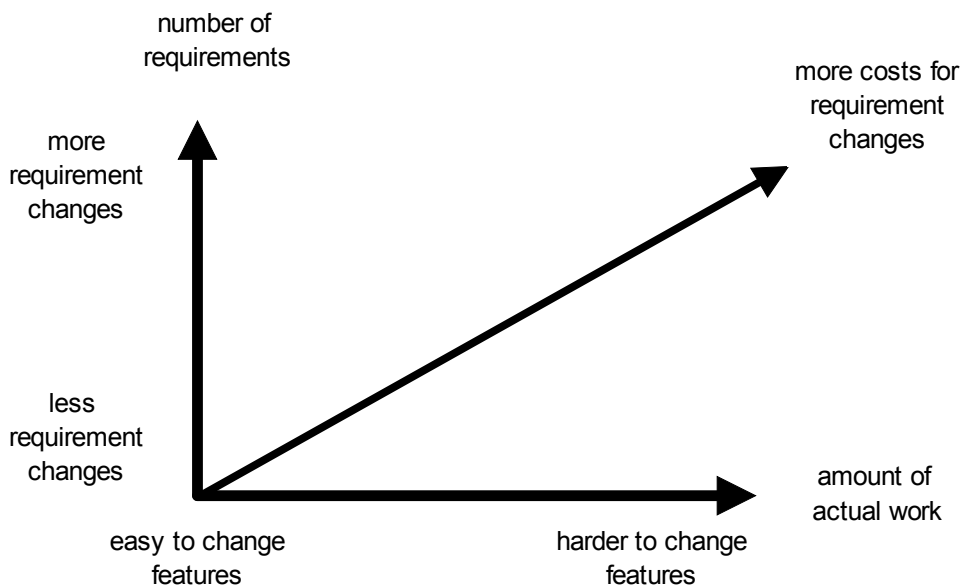
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121 **Proposal: Number of different information system features could assessed carefully.**

122

123 **Proposal: There should not be too much features in information systems.**

124



125

126

127 One issue is number of different requirements. There can be too many requirement changes which
128 mean more work for system developers.

129

130 **Proposal: Number of requirements could be assessed carefully.**

131

132 **Proposal: All new requirements should be assessed very carefully before implementing**
133 **different requirements in different information systems.**

134

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

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137

138

139 I have advocated usage of web feeds ¹ on several previous opinion documents. Actually there are
140 two standards for web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

141

142 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
143 **informations systems (EU / Member states).**

144

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

147

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

151

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

153

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

156

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

161

162 [Continues on the next page]

163

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

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

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

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

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

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

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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

- 209 EN: Opinion 19: Official Acknowledgement by the Commission
210 http://www.jukkarannila.fi/lausunnot.html#nro_19
211
- 212 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
213 http://www.jukkarannila.fi/lausunnot.html#nro_20
214
- 215 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
216 http://www.jukkarannila.fi/lausunnot.html#nro_21
217
- 218 EN: Opinion 23: Public consultation on the review of the European Standardisation System
219 http://www.jukkarannila.fi/lausunnot.html#nro_23
220
- 221 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
222 http://www.jukkarannila.fi/lausunnot.html#nro_27
223
- 224 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
225 http://www.jukkarannila.fi/lausunnot.html#nro_28
226
- 227 EN: Opinion 30: Internet Filtering
228 http://www.jukkarannila.fi/lausunnot.html#nro_30
229 NOTE: Organised by the European Committee for Standardization (CEN) ⁷
230
- 231 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
232 http://www.jukkarannila.fi/lausunnot.html#nro_32
233
- 234 EN: Opinion 34: REMIT Registration Format
235 http://www.jukkarannila.fi/lausunnot.html#nro_34
236 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁸
237
- 238 EN: Opinion 35: Exploiting the employment potential of the personal and household services
239 http://www.jukkarannila.fi/lausunnot.html#nro_35
240
- 241 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
242 http://www.jukkarannila.fi/lausunnot.html#nro_37
243
- 244 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
245 http://www.jukkarannila.fi/lausunnot.html#nro_39
246
- 247 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
248 http://www.jukkarannila.fi/lausunnot.html#nro_40
249
- 250 EN: Opinion 41: AT.39398: observations on the proposed commitments
251 http://www.jukkarannila.fi/lausunnot.html#nro_41

⁷ <http://www.cen.eu/> (Accessed 2 July 2012)

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

- 252
253 EN: Opinion 42: Opening up Education
254 http://www.jukkarannila.fi/lausunnot.html#nro_42
255
256 EN: Opinion 43: Publication of extracts of the European register of market participants
257 http://www.jukkarannila.fi/lausunnot.html#nro_43
258 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
259
260 EN: Opinion 44: Evaluation policy guidelines
261 http://www.jukkarannila.fi/lausunnot.html#nro_44
262
263 EN: Opinion 45: About ICT standardisation
264 http://www.jukkarannila.fi/lausunnot.html#nro_45
265
266 EN: Opinion 46: Review of the EU copyright rules
267 http://www.jukkarannila.fi/lausunnot.html#nro_46
268
269 EN: Opinion 51: European Area of Skills and Qualifications
270 http://www.jukkarannila.fi/lausunnot.html#nro_51
271
272 EN: Opinion 52: Trusted Cloud Europe Survey
273 http://www.jukkarannila.fi/lausunnot.html#nro_52
274
275 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
276 http://www.jukkarannila.fi/lausunnot.html#nro_53
277 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
278
279 EN: Opinion 55: European Energy Regulation
280 http://www.jukkarannila.fi/lausunnot.html#nro_55
281 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
282
283 EN: Opinion 59: Green paper on mobile Health
284 http://www.jukkarannila.fi/lausunnot.html#nro_59
285
286 EN: Opinion 60: Cross-border inheritance tax problems within the EU
287 http://www.jukkarannila.fi/lausunnot.html#nro_60
288
289 EN: Opinion 61: European Register of Products Containing Nanomaterials
290 http://www.jukkarannila.fi/lausunnot.html#nro_61
291
292 EN: Opinion 64: Corporate Social Responsibility - European Commission
293 http://www.jukkarannila.fi/lausunnot.html#nro_64
294
295 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
296 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 297
298 EN: Opinion 68: European Network Code Stakeholder Committees
299 http://www.jukkarannila.fi/lausunnot.html#nro_68
300 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
301
302 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
303 http://www.jukkarannila.fi/lausunnot.html#nro_71
304 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
305
306 EN: Opinion 74: Enabling the Internet of Things
307 http://www.jukkarannila.fi/lausunnot.html#nro_74
308 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁹
309
310 EN: Opinion 80: Mandatory Transparency Register
311 http://www.jukkarannila.fi/lausunnot.html#nro_80
312
313 EN: Opinion 84: Revision of the European Interoperability Framework
314 http://www.jukkarannila.fi/lausunnot.html#nro_84
315
316 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
317 http://www.jukkarannila.fi/lausunnot.html#nro_86
318
319 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
320 http://www.jukkarannila.fi/lausunnot.html#nro_88
321
322 EN: Opinion 89: BEREC Guidelines for net neutrality rules
323 http://www.jukkarannila.fi/lausunnot.html#nro_89
324 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
325
326 EN: Opinion 93: Safety of apps and other non-embedded software
327 http://www.jukkarannila.fi/lausunnot.html#nro_93
328
329 EN: Opinion 95: Targeted consultation on eForms
330 http://www.jukkarannila.fi/lausunnot.html#nro_95
331
332 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
333 http://www.jukkarannila.fi/lausunnot.html#nro_97
334
335 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
336 http://www.jukkarannila.fi/lausunnot.html#nro_98
337
338 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
339 Regulators. Recast
340 http://www.jukkarannila.fi/lausunnot.html#nro_99

⁹ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 341
342 EN: Opinion 100: Protection of personal data (EU)
343 http://www.jukkarannila.fi/lausunnot.html#nro_100
344
345 EN: Opinion 101: Governance of the Energy Union
346 http://www.jukkarannila.fi/lausunnot.html#nro_101
347
348 EN: Opinion 102: Smart Wearables
349 http://www.jukkarannila.fi/lausunnot.html#nro_102
350
351 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
352 (ENISA)
353 http://www.jukkarannila.fi/lausunnot.html#nro_106
354
355 EN: Opinion 108: Single Digital Gateway
356 http://www.jukkarannila.fi/lausunnot.html#nro_108
357
358 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
359 http://www.jukkarannila.fi/lausunnot.html#nro_110
360
361 EN: Opinion 111: Interoperability of information systems for migration and security
362 http://www.jukkarannila.fi/lausunnot.html#nro_111
363
364 EN: Opinion 113: Transform of health and care
365 http://www.jukkarannila.fi/lausunnot.html#nro_113
366
367 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
368 Internet
369 http://www.jukkarannila.fi/lausunnot.html#nro_114
370 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
371
372 EN: Opinion 118: Fake news and online disinformation
373 http://www.jukkarannila.fi/lausunnot.html#nro_118
374
375 EN: Opinion 119: European Social Security Number
376 http://www.jukkarannila.fi/lausunnot.html#nro_119
377
378 EN: Opinion 120: European Labour Authority
379 http://www.jukkarannila.fi/lausunnot.html#nro_120
380
381 EN: Opinion 121: 2nd Data Package
382 http://www.jukkarannila.fi/lausunnot.html#nro_121
383
384
385

- 386 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
387 Cybersecurity Research and Competence Centre
388 http://www.jukkarannila.fi/lausunnot.html#nro_122
389
- 390 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
391 THE COUNCIL on the re-use of public sector information (recast)
392 http://www.jukkarannila.fi/lausunnot.html#nro_123
393
- 394 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
395 http://www.jukkarannila.fi/lausunnot.html#nro_125
396
- 397 EN: Opinion 128: Summertime arrangements
398 http://www.jukkarannila.fi/lausunnot.html#nro_128
399
- 400 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
401 http://www.jukkarannila.fi/lausunnot.html#nro_129
402
- 403 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
404 http://www.jukkarannila.fi/lausunnot.html#nro_132
405
- 406 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
407 ("eForms")
408 http://www.jukkarannila.fi/lausunnot.html#nro_133
409
- 410 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
411 UCC
412 http://www.jukkarannila.fi/lausunnot.html#nro_134
413
- 414 EN: Opinion 141: Farm Accountancy Data Network
415 http://www.jukkarannila.fi/lausunnot.html#nro_141
416
- 417 EN: Opinion 142: Horizon Europe (two consultations)
418 http://www.jukkarannila.fi/lausunnot.html#nro_142
419
- 420 My opinions to the previous and relevant consultations – there consultations were mostly organised
421 by the European Commission. General page to all consultations – both in English and in Finnish:
422 <http://www.jukkarannila.fi/lausunnot.html>
423

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ANNEX 2

426 DISCLAIMERS

427

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430 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

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434

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