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TO: Remit.PublicConsultations@acer.europa.eu

TO: ACER (Agency for the Cooperation of Energy Regulators)

Reference: Public Consultation: Common Schema for the Disclosure of Inside Information (PC_2015_R_03)

Public opinion about Common Schema for the Disclosure of Inside Information

First of all, thanks for ACER (Agency for the Cooperation of Energy Regulators) organising this very interesting public consultation.

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

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

ACER can publish this opinion (PDF file) on a relevant web page.

Annex 1 holds information about previous consultations.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

39

40 General: Previous consultations

41

42 I gave earlier opinions to ACER and PDF files of those opinions are on the following page:

43

44 EN: Opinion 34: REMIT Registration Format

45 http://www.jukkarannila.fi/lausunnot.html#nro_34

46

47 EN: Opinion 43: Publication of extracts of the European register of market participants

48 http://www.jukkarannila.fi/lausunnot.html#nro_43

49

50 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)

51 http://www.jukkarannila.fi/lausunnot.html#nro_53

52

53 EN: Opinion 55: European Energy Regulation

54 http://www.jukkarannila.fi/lausunnot.html#nro_55

55

56 EN: Opinion 68: European Network Code Stakeholder Committees

57 http://www.jukkarannila.fi/lausunnot.html#nro_68

58

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

60

61 Since this opinion is done by an individual citizen (Finland / EU), the knowledge base for this
62 consultation is naturally rather limited, since there has not been a group of experienced experts
63 writing this opinion.

64

65 Concepts (Database) → Displays / Interfaces → System

66

67 There are different views about implementing information systems. Here we can note that this
68 consultation is about assessing carefully different concepts.

69

70 Personally I have advocated collection of concepts first; then it should be easier to start developing
71 different interfaces / displays for a system.

72

73 Note: This consultation is about specification of different concepts.

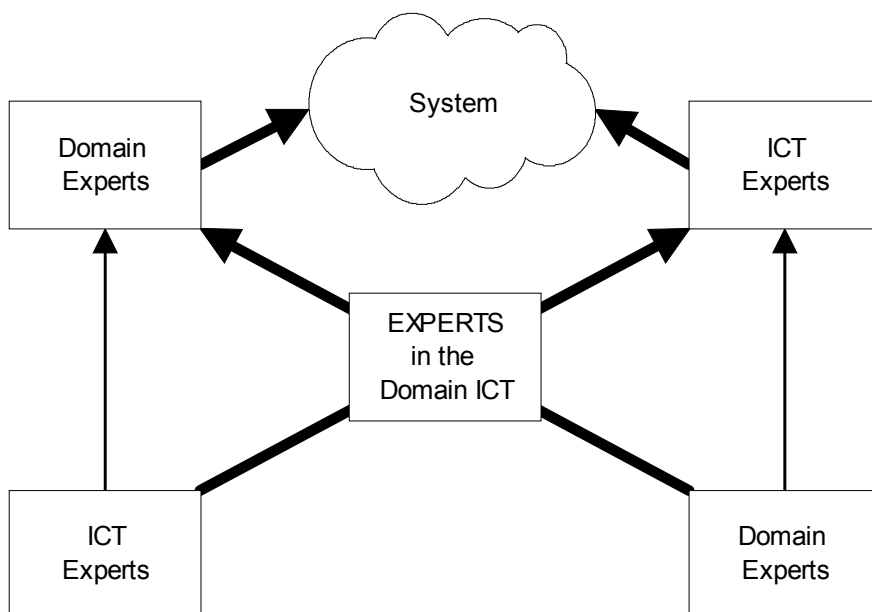
74

75 After explicating different concepts there can be serious work for actually implementing actual
76 information system. Applying information technology to different domains means different work
77 since in many cases there are already different information systems.

78

79 Experts in the domain ICT means a lot of education for different stakeholder groups. ICT experts
80 try to implement system to a certain domain and there is always some learning processes for ICT
81 experts. Domain experts have always some learning processes for understanding possibilities of
82 ICT in a specific domain.

83



84
85

86 Here we can note that this consultation is about different concepts. Based on the results of this
87 consultation there could be a consultation about technical details of different systems.

88

89 **Proposal: Decision for more technical consultation(s) could be done based on the**
90 **results of this consultation about concepts / conceptual schemas.**

91

92 **Question 4: Do you agree with the use of RSS or ATOM feeds to fulfil the requirement under**
93 **Article 10(1) of the REMIT Implementing Regulation?**

94

95 I start from the easiest (**Question 4**) issue first – web feeds.

96

97 Here I can reiterate that RSS feeds should be used extensively. I have advocated usage of web feeds
98 (RSS and/or Atom) on all previous opinion documents which have been addressed to ACER.

99



100
101

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

104

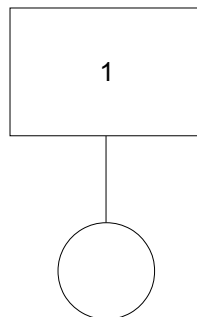
105 **Proposal: There can be different web feeds (RSS and/or ATOM) for different**
106 **stakeholder(s) – having just one web feed (RSS and/or ATOM) may not be a feasible**
107 **solution.**

108

109

110 **The reality with different interfaces / displays**

111



112

113

114 On the consultation document there was not too much text about different interfaces. An
 115 information system can have just an interface / a display.

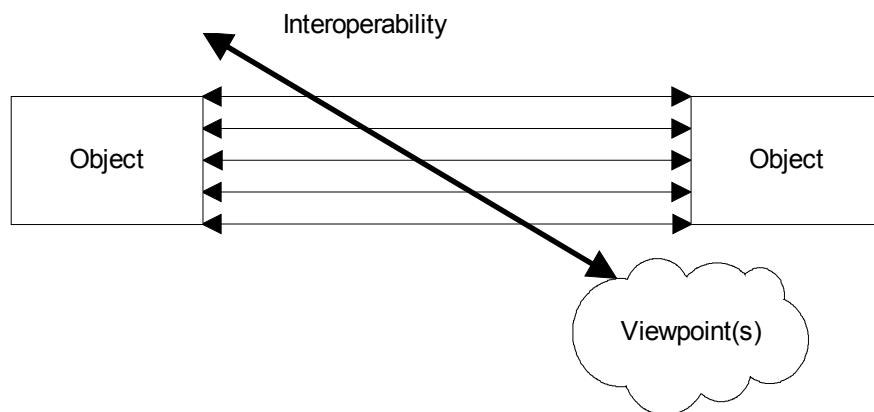
116

117 Here can be noted that interoperability is based on different viewpoints.

118

119 **Proposal: Different viewpoints for different systems could be collected in different**
 120 **phases.**

121



122

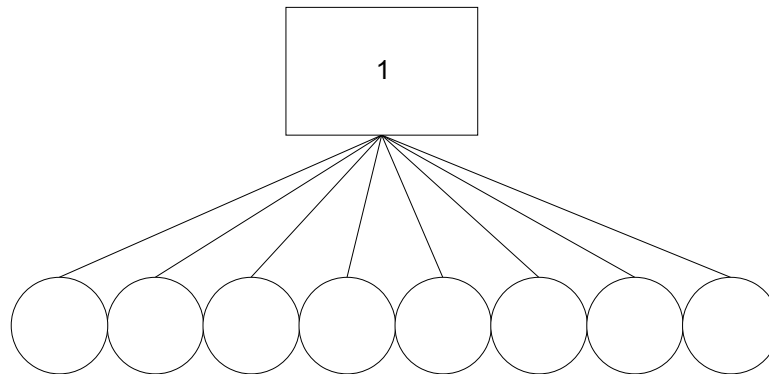
123

124 This leads to conclude that there can be several interfaces and/or displays based on different
 125 viewpoints.

126

127 **Proposal: Interfaces / Displays based on different viewpoints could be assessed**
 128 **carefully.**

129



130

131

132 So there can be several interfaces / displays in a system. The next step could be assessments needs
 133 for different interfaces / displays. Then it should be easier to evaluate which interfaces / displays are
 134 developed first.

135

136 **Proposal: There could be some efforts to collect information about the need for
 137 different interfaces / displays.**

138

139 **Proposal: There could be some efforts evaluate actual needs for different interfaces /
 140 displays.**

141

142 Here we can note that handling different viewpoints can mean also different web feeds (RSS and/or
 143 ATOM).

144

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

146

147 **What should be the order for developing different interfaces?**

148

149 In previous consultations I have proposed following order for developing different interfaces.

150

151 (1) First phase is creating different interfaces for expert users – expert users can use a system very
 152 often. (2) Second phase could be based on daily usage – not every hour. (3) Casual users could have
 153 their own interface. (4) Then there could be interface for one-time usage.

154

155 Actually expert users need different shortcuts everywhere and their interfaces can be very simple –
 156 but very efficient on the other hand. Other users can gradually gain expertise based on the usage of
 157 a system and part of other users can be experts users in some timeframe.

158

159 **Proposal: There could be some efforts with some stakeholders to gather ideas for
 160 different interface proposals.**

161

162 **Proposal: Different displays and/or interfaces proposals could be assessed based on
 163 different needs of different stakeholders.**

164

165 **Question 1: Would you add any other field not included in the current proposal? If so, please**
 166 **explain your reasoning.**

167
 168 **Note: I have proposed (previous opinions) in many cases creation of internal identifiers**
 169 **(ID) in different information system.**

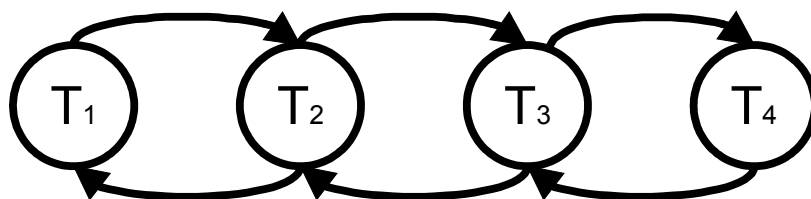
170
 171 **Note: Naturally external identifiers (ID) are used extensively for creating cooperation**
 172 **between different information systems.**

173
 174 **Proposal: There could be mentioning about field 0 for internal identifiers (ID) in**
 175 **different systems.**

176
 177 When everything goes well there is not a need for using internal identifiers (ID) since external IDs
 178 can handle different situations. However different changes can be managed better with internal
 179 identifiers (ID).

180
 181 One issue is linking information of different events and/or states in information systems. These
 182 relations can be very long temporal (T_1, T_2, T_3, T_4) chains ($T_n \leftrightarrow T_n$) of information.

183



184

185

186 **Question: Should there be some linking of message IDs?**

187

188 **Question: Should there be field 1/b for previous message ID?**

189

190 **Note: Field 1/a could be still be Message ID.**

191

192 **Proposal: Field 1/b could be voluntary field.**

193

194

1/b Previous message ID

Field Identifier	Description	Accepted Values	Example	Applicability
Previous message ID	Unique identifier the previous UMM	Free text	12345-28X- Trading AG-BR--C	<i>voluntary</i>

195

196 It can be noted that field 2 (**Update ID**) takes care of temporal changes in a specific message.

197

198 **Question 2: Would you remove any field represented in the current proposal? If so, please**
 199 **explain your reasoning.**

200

201 In previous consultations I have proposed evaluation of different conceptual models. This
 202 consultation is actual serious assessment of different concepts (conceptual models).

203

204 **Proposal: Like said earlier different concepts could be used for creating different**
 205 **interfaces / displays for different stakeholders.**

206

207 **Proposal: Different interfaces / displays can be based on combining some concepts to a**
 208 **specific interface / display.**

209

210 **Question 3: Would you change any of the descriptions, accepted values or applicability? If so,**
 211 **please explain your reasoning. Are the schemas or values that you are suggesting based on any**
 212 **industry standard? Which one(s)?**

213

214 **Answer 1 to the question 3**

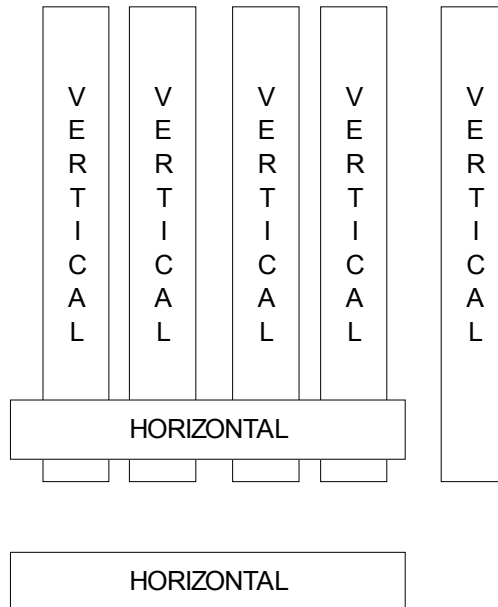
215

216 There are several standard setting organisations in the information technology field and one
 217 comprehensive list ¹ is provided by ConsortiumInfo.org. There could be some assessments based on
 218 the list of standard setting organisations. Based on some assessments there could be some industry
 219 standards to be evaluated.

220

221 Personally I advocate using different horizontal standards. For example email standards (horizontal)
 222 are implemented with very different technologies (vertical).

223



224

225

226

Horizontal standards and vertical standards

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

227 **Proposal: There could be assessments of different standard setting organisations.**

228

229 **Proposal: Based on assessments of standard setting organisations there could be some**
230 **reasoned decisions of usable standards – some of those standards can be about**
231 **conceptual schemas.**

232

233 **Proposal: Developing horizontal standards could be favoured.**

234

235 Here we can note that common schema for the disclosure of inside information is a horizontal
236 (standard) and there can be serious cooperation with other systems.

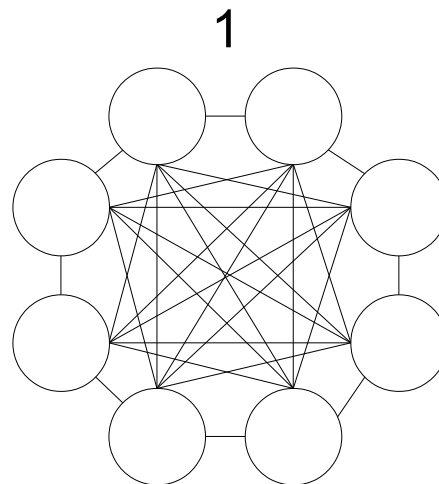
237

238 **Answer 2 to the question 3**

239

240 **Organisation of different systems**

241



Complex many-to-many connections

242

243

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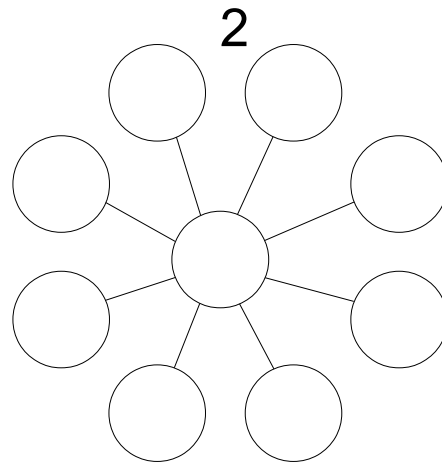
245 Generally speaking many systems are connected in many ways. Average users of connected systems
246 in many cases dont know about these connections. However different changes in different
247 (sub)systems can mean a lot of work since there are so many many-to-many connections. The
248 problem with this situation is updating/modifying a system since one update can mean a lot
249 adjustment with different systems.

250

251 Since there are sometimes serious problems with complex many-to-many connections we can
252 conclude that there could be other solutions.

253

254 There can be a central system for cooperation between systems. The problem with this situation is
255 that having just one central point can mean problems when one central system does not work
256 correctly.

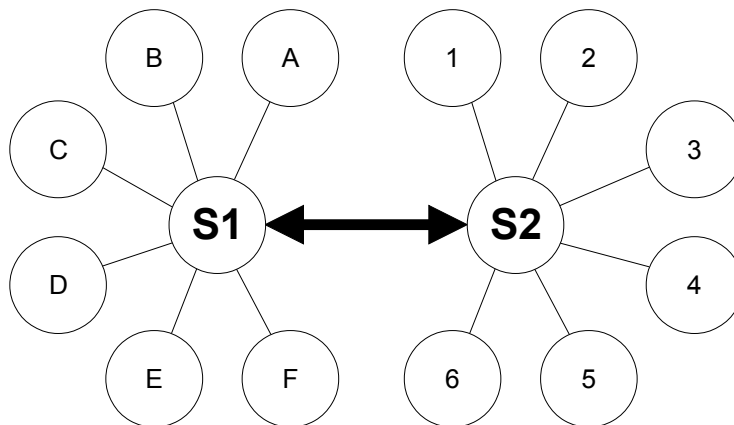


One central system

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Next possibility is to have cooperation between some (S1 and S2) central systems. This means that everything is not depending on just one system.

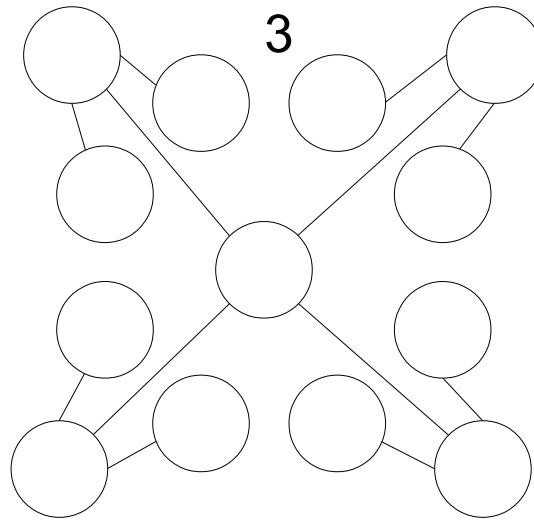
1-2



Cooperation between two central systems

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Next option is to have hierarchies between systems. In this way there is one central systems and some sub-systems. Then these sub-systems can handle other sub-systems. In this way everything is not depending on just one system.



Hierarchical organisation of different systems

Conclusion – cooperation between different systems – conceptual issues?

So there can be several ways for organising different (sub)systems. In many cases there are problems with different concepts since many systems are developed by different communities.

Proposal: Conceptual schemas of different systems could be explicated.

Note: There can be a lot of variety with conceptual schemas in different systems.

This means different adjustments in different (sub)systems since different systems are developed with different conceptual schemas.

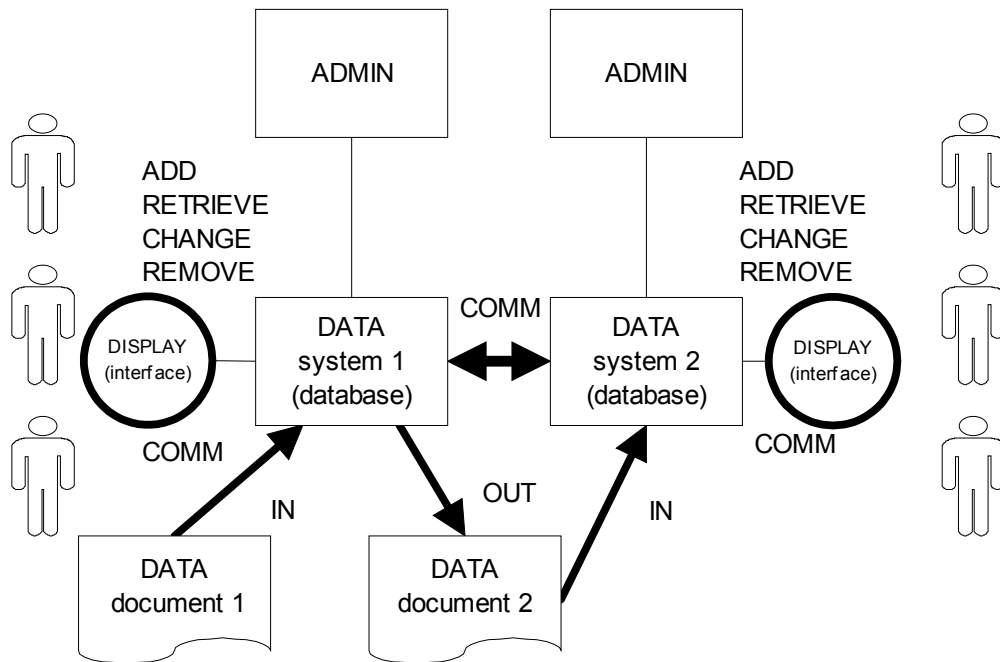
Proposal: There could be an assessment of different systems – can different systems be adjusted to comply with proposed (this consultation) schemas?

Proposal: Both options could be assessed:

- 1) Systems handle consolidation of conceptual schemas **INSIDE** systems.
- 2) There are **EXTERNAL** systems which could handle consolidation of conceptual schemas.

Here can be noted that there are unique systems used inside/outside of different communities. This means that different information systems have unique situations: some systems can be rather old, some systems are under development, some systems are to be terminated in the (near) future and other different situations.

Proposal: Perhaps both options have to be implemented – some systems handle consolidation **INSIDE and some systems handle consolidation **OUTSIDE**.**



301

302

303 Here we can note that there are two ways for cooperation between systems:

304

- 305 • Direct contacts – system to system
- 306 • Contacts with using different documents between systems.

307

308 Here we can note that direct contacts (system to system) are always prone for different failures.

309 When using documents there are not so many direct contacts (system to system).

310

311 **Proposal: Need for different direct contacts (system to system) should be assessed critically.**

312

313 **Proposal: Need for using different documents should be assessed critically.**

314

315 **Note: Like noted earlier there can be some variation of conceptual schemas in different systems.**

316

317 **Answer 3 to the question 3**

318

319 **Member state systems and European Union systems? Cooperation between systems?**

320

- 321 • member state systems (MSS)
- 322 • member state contact point (MCP)
- 323 • European Union systems (EUS)
- 324 • European Union contact point (EUCP).

325

326

327

328 Here can be noted that there can be different systems having cooperation between systems. There
 329 are some classes for systems. Here we can note that there can be several member state systems
 330 (MSS).

331

332 **What this means on the European Union level?**

333

334 Here can make some calculations for member state systems:

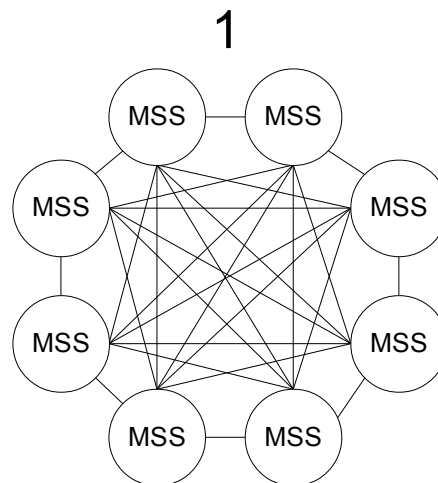
335

- 336 • 1 x 28 member state systems = 28 systems
- 337 • 5 x 28 member state systems = 140 systems
- 338 • 10 x 28 member state systems = 280 systems
- 339 • 15 x 28 member state systems = 420 systems
- 340 • 20 x 28 member state systems = 560 systems.

341

342 The situation between member states can vary in many ways. So there can different and unique
 343 systems between member states.

344



Member state systems (MSS)

345

346

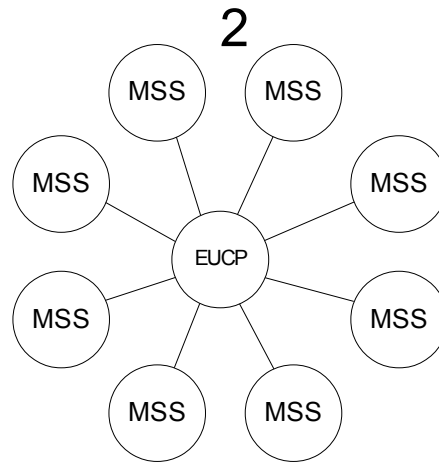
347

348 Like said earlier there can be several many-to-many connections between member state systems.

349

350 The next option is to have an European Union contact point. There were some calculations about
 351 number of different systems (from 28 systems to 560 systems). Here we can note that the number of
 352 connections (EU ↔ member states) can be overwhelming.

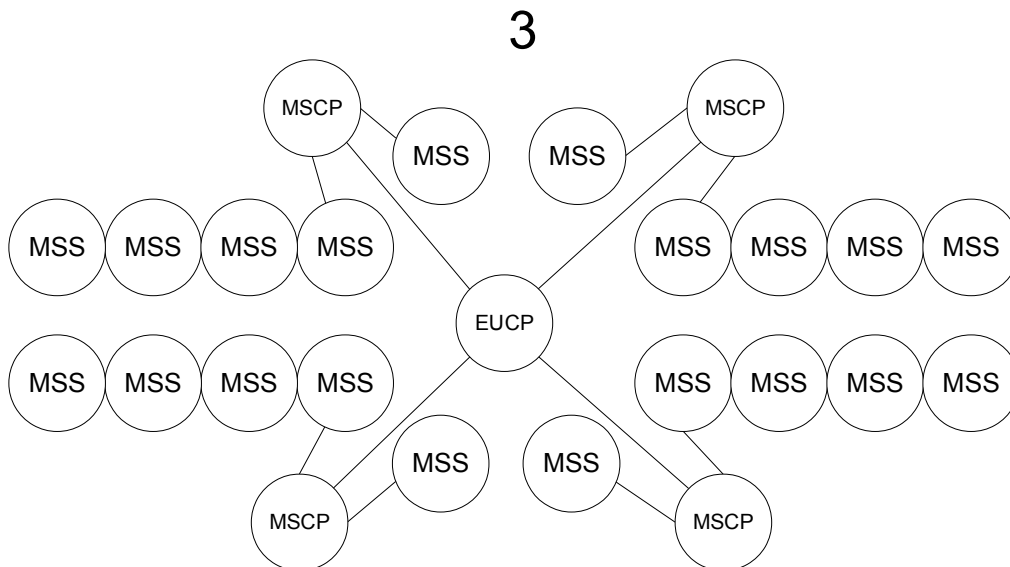
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Member state systems (MSS); European Union contact point (EUCP)

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



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**Member state systems (MSS); European Union contact point (EUCP);
Member state contact point (MCP)**

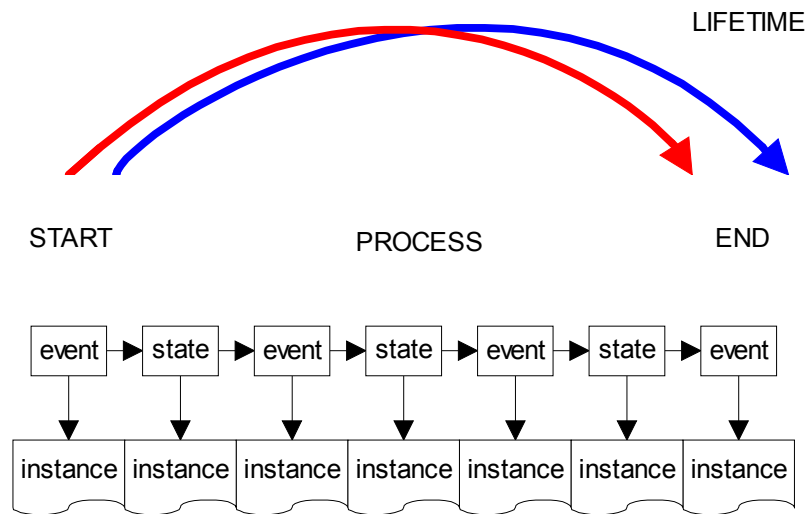
Proposal: There could be member state contact points (MSCP) which can handle consolidation of different member state systems (MSS).

371 **Proposal: There could be European Union contact point (EUCP) which gathers**
 372 **information from member state contact points (MSCP) .**

373
 374 Here we can note that with member state contact points (MCP) member states can gradually
 375 consolidate different (e.g. from 28 to 560 systems) member state systems with own timetable.
 376

377 **Summary – cooperation between different stakeholders?**

378



379
 380

381 Here we can note that different public systems (Member state systems (MSS); European Union
 382 contact point (EUCP); Member state contact points (MCP)) and private sector systems can be
 383 consolidated in different ways.

384

385 The problem is that there are different life-cycles with different systems. Consolidation of
 386 information systems which have different life-cycles will mean a lot of work. It can be noted that
 387 there can be new stakeholder groups which have interest for using different information systems.
 388

389

Note: There can be new stakeholder groups in the near/distant future.

390

**Note: Different systems should be working all the time even though new stakeholders
 392 have connections with different information systems.**

393

**Note: When new and different systems are introduced there can be some needs for data
 395 transformation and/or system transformation.**

396

**Note: Keeping interoperability between different systems means constant work all the
 398 time.**

399

**Proposal: Like explicated earlier there could be more technical consultation(s) after
 401 explicating different conceptual schemas.**

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

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

EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_20

- 446 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
447 http://www.jukkarannila.fi/lausunnot.html#nro_21
448
- 449 EN: Opinion 23: Public consultation on the review of the European Standardisation System
450 http://www.jukkarannila.fi/lausunnot.html#nro_23
451
- 452 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
453 http://www.jukkarannila.fi/lausunnot.html#nro_27
454
- 455 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
456 http://www.jukkarannila.fi/lausunnot.html#nro_28
457
- 458 EN: Opinion 30: Internet Filtering
459 http://www.jukkarannila.fi/lausunnot.html#nro_30
460 NOTE: Organised by the European Committee for Standardization (CEN) ²
461
- 462 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
463 http://www.jukkarannila.fi/lausunnot.html#nro_32
464
- 465 EN: Opinion 34: REMIT Registration Format
466 http://www.jukkarannila.fi/lausunnot.html#nro_34
467 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ³
468
- 469 EN: Opinion 35: Exploiting the employment potential of the personal and household services
470 http://www.jukkarannila.fi/lausunnot.html#nro_35
471
- 472 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
473 http://www.jukkarannila.fi/lausunnot.html#nro_37
474
- 475 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
476 http://www.jukkarannila.fi/lausunnot.html#nro_39
477
- 478 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
479 http://www.jukkarannila.fi/lausunnot.html#nro_40
480
- 481 EN: Opinion 41: AT.39398: observations on the proposed commitments
482 http://www.jukkarannila.fi/lausunnot.html#nro_41
483
- 484 EN: Opinion 42: Opening up Education
485 http://www.jukkarannila.fi/lausunnot.html#nro_42
486
487
488 [Continues on the next page]

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

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

- 489 EN: Opinion 43: Publication of extracts of the European register of market participants
490 http://www.jukkarannila.fi/lausunnot.html#nro_43
491 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
492
- 493 EN: Opinion 44: Evaluation policy guidelines
494 http://www.jukkarannila.fi/lausunnot.html#nro_44
495
- 496 EN: Opinion 45: About ICT standardisation
497 http://www.jukkarannila.fi/lausunnot.html#nro_45
498
- 499 EN: Opinion 46: Review of the EU copyright rules
500 http://www.jukkarannila.fi/lausunnot.html#nro_46
501
- 502 EN: Opinion 51: European Area of Skills and Qualifications
503 http://www.jukkarannila.fi/lausunnot.html#nro_51
504
- 505 EN: Opinion 52: Trusted Cloud Europe Survey
506 http://www.jukkarannila.fi/lausunnot.html#nro_52
507
- 508 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
509 http://www.jukkarannila.fi/lausunnot.html#nro_53
510 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
511
- 512 EN: Opinion 55: European Energy Regulation
513 http://www.jukkarannila.fi/lausunnot.html#nro_55
514 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
515
- 516 EN: Opinion 59: Green paper on mobile Health
517 http://www.jukkarannila.fi/lausunnot.html#nro_59
518
- 519 EN: Opinion 60: Cross-border inheritance tax problems within the EU
520 http://www.jukkarannila.fi/lausunnot.html#nro_60
521
- 522 EN: Opinion 61: European Register of Products Containing Nanomaterials
523 http://www.jukkarannila.fi/lausunnot.html#nro_61
524
- 525 EN: Opinion 64: Corporate Social Responsibility - European Commission
526 http://www.jukkarannila.fi/lausunnot.html#nro_64
527
- 528 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
529 http://www.jukkarannila.fi/lausunnot.html#nro_66
530
- 531 EN: Opinion 68: European Network Code Stakeholder Committees
532 http://www.jukkarannila.fi/lausunnot.html#nro_68
533 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

534

535

ANNEX 2

536 DISCLAIMERS

537

538 Legal disclaimer:

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

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

544

545 Political disclaimer:

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

549

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