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SR 307
Finnish Standards Association SFS
(to be submitted to AENOR, AENOR as the Secretariat)

Reference document: CEN/PC 365 N 045 (dated: 2011-04-04)

**Consultation: Internet content and communications filtering software and services /
NEW VERSION OF DRAFT TS 00365001**

First of all, a lot of thanks to AENOR ¹ (The Spanish Association for Standardization and Certification) and SFS ² (Finnish Standards Association SFS) for organising this consultation about Internet Content and communications filtering software and services.

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- any confidential information.

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Annex 1 holds information about disclaimers and copyright.

Best Regards,

Jukka Rannila
citizen of Finland

signed electronically

[The opinion starts on the next page]

¹ <http://www.en.aenor.es/>

² <http://www.sfs.fi/en/>

41

42 **General remarks**

43

44 Here is my proposals for standardising Internet content and communications filtering software and
45 services:

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- 47
- 1) Standardising the paper forms for end users**
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- 2) Standardising the web forms for end users**
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- 49
- 3) Standardising the content of information feeds between different stakeholders.**

50

51 **1) There should be measures to really have highly readable standard contract**
52 **forms related to Internet filtering**53 **2) There should be different logotypes for different filtering measures.**

54

55 **1) mass imports / mass exports about filtering**56 **2) very tiny changes in filtering, possibly individually tailored**57 **3) and between these two extremes.**

58

59 Next I will go through those proposals in detail.

60

61 **Going through some basic concepts**

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63 I will start explaining my (humble) opinion from the very beginning, since it seems that working
64 document CEN/PC 365 N 045 implicitly expects the readers to understand a huge variety of
65 information about the computers and communications.

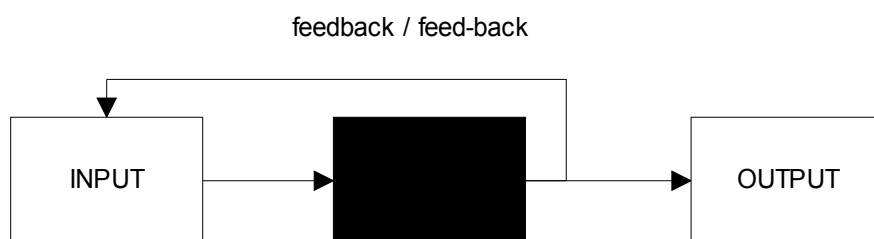
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67 However, these concepts are not scientifically valid, since they are conceptions of a one person.

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69 **Definition of computer**

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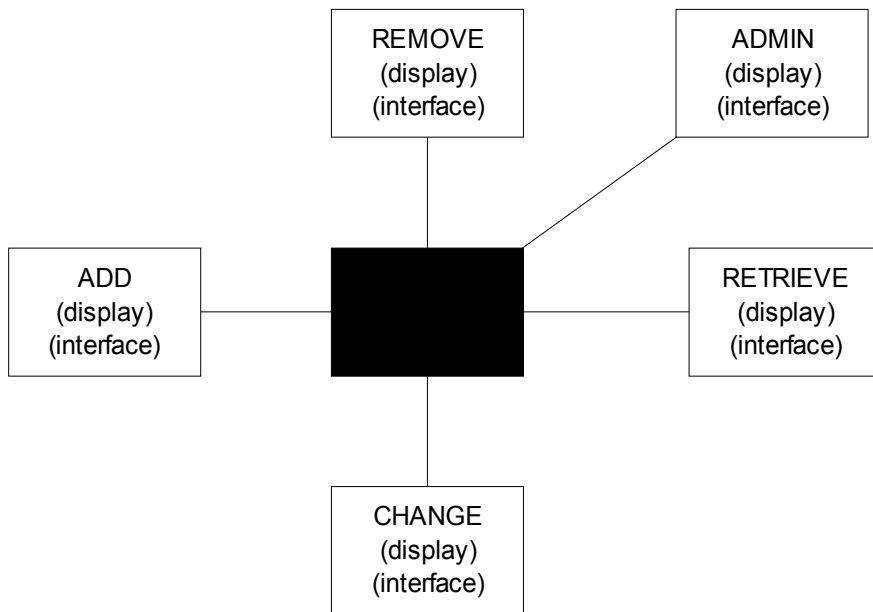


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73 In the simplest form of definition we can have a simple model, where a computer is a “black box”
74 with simple input and output. For many users this is the most prevalent form of usage, since they
75 juts use the system without thinking any larger ramifications.

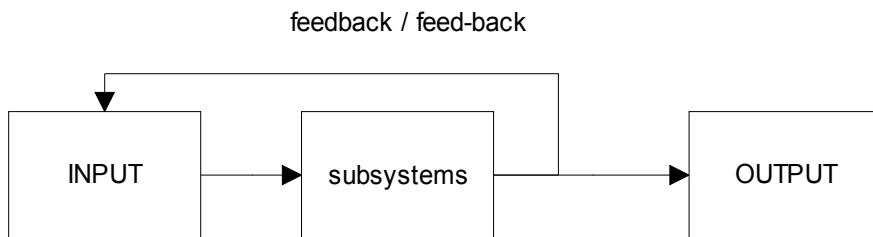
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To be more specific, we can have four very basic functions for a computer: add, retrieve, remove and change. And actually in many cases there is the fifth function for administration, which can change all inner workings of a computer system.

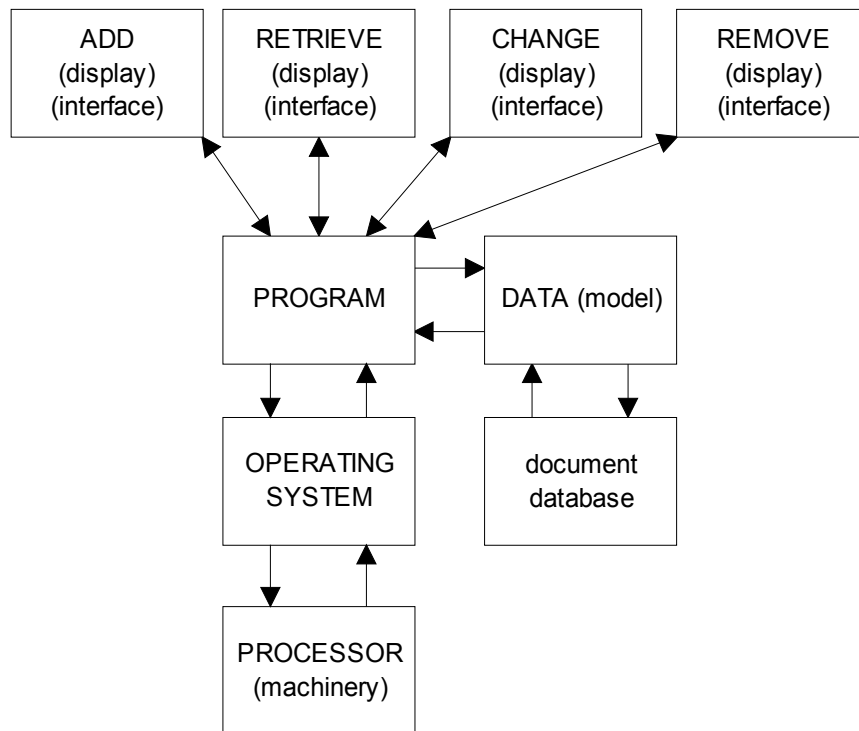
In many cases administration can/will/should understand the subsystems of a computer system.



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The most basic form of using a computer is using programs in a computer system. If everything is fine, the basic user is worried about using properly the programs of a computer system.

[Continues on the next page]



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93

94 Actually, there is a operating system, which is between programs and processor(s). The operating
95 system actually “talks” with the processor and other machinery of a computer system. Once again,
96 if everything is fine, a basic user might not know anything about operating system(s).

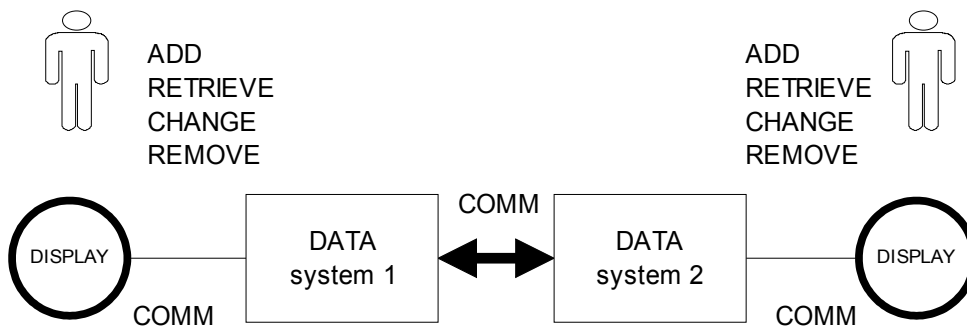
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98 For using data in a computer system there is two basic forms: document and database. In a
99 document there can be a lot of free-form data, even though the rules for organising the free-form
100 data in a document highly structured. In a database the data is structure otherwise, when the data is
101 in smaller bits, and every bit of information is independent of each other, and the human-
102 understandable information is relations of independent bits of information.

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104 **Networks of computers**

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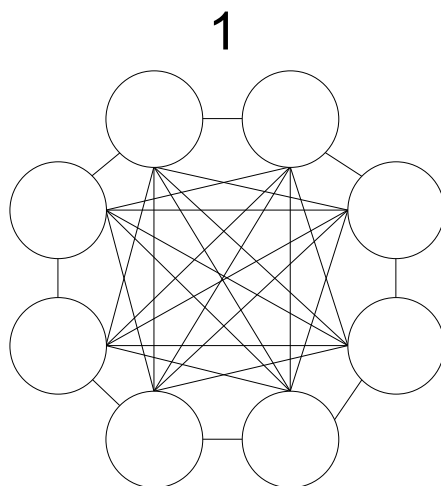
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108 Naturally, several computers can be networked with some communications (COMM) method.
109 Actually there can different computers displaying the same data from computer-based system(s). In
110 some cases these displaying computers are “dummy”, since almost all processing can be done in
111 computer, which is communicating with the computer displaying the data.

112
113 Since this consultation is about Internet standards, it can be said that communications (COMM)
114 between different computers can be organised with several layers of communicating computers
115 between the displaying computer and data processing computer.

116
117 **All-to-all networks**

118



119

120

121 One way of organising computer-based networks would be all computers communicating with all
122 other computers. In practical terms this might be complicated, if there is several communicating
123 methods (standards), and this might cause several layers of all-to-all communication problems.

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125 **One-to-many networks**

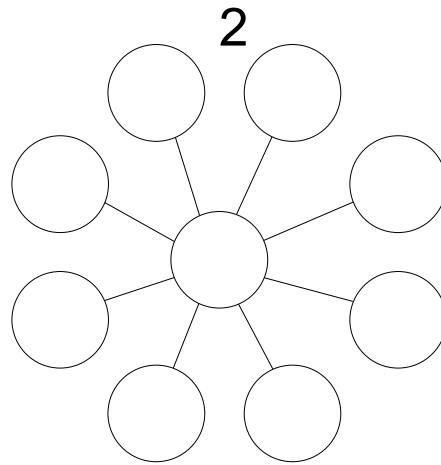
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127 One option is naturally the total opposite solution, where there is one central point, and all
128 communications go through that central point. The problem with this solution is, that one central
129 point can be have problems and causing the whole communication system to fall.

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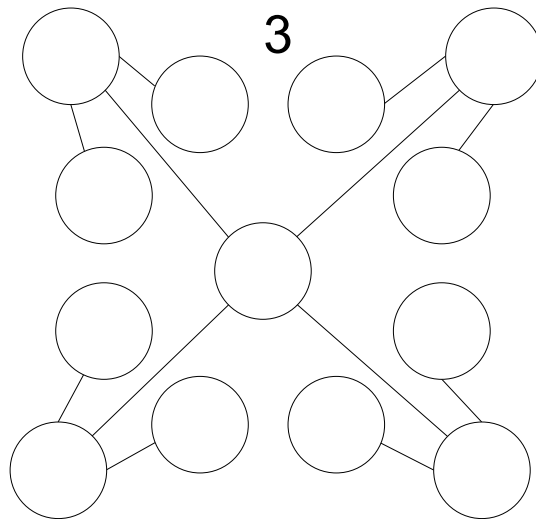
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Replicating the central point



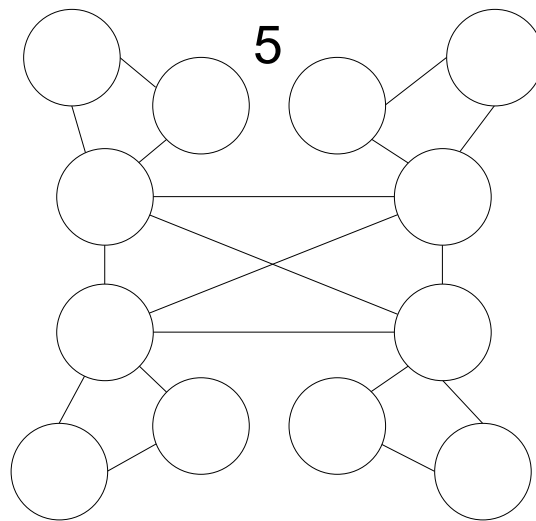
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One obvious way is replicating the data from a central point. In some systems this is very feasible, if the central data is changed/removed/added based on some clear-cut intervals. In this way there can smaller one-to-many networks.

Other modes for communication networks

There can be several modes for communication networks³, and one of the final forms is that many points are interlinked with each other, and central points can be interlinked with many central points. In this way the failure of communication between two points can be easily bypassed by using other communication line/way.

³ Models 1, 2, 1-2, 3, 4, 5 can be presented.



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152 **Practical reality**

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154 In practical reality a large and widely-used system can use several communicating methods, which
155 naturally means very complicated computer-based systems.

156

157 **Third-party systems (broker systems)**

158

159 In practical reality there must a trusted third-party systems, which will facilitate computer-based
160 communication between two parties, could be also called a broker system.

161

162 [Check the next figure]

163

164 When there is different broker system(s), there can be several events and states during the
165 communications between two systems. One communication instance might last just for seconds
166 (lifetime) or there can be communication instance, which can be used with different intervals, e.g.
167 daily or weekly.

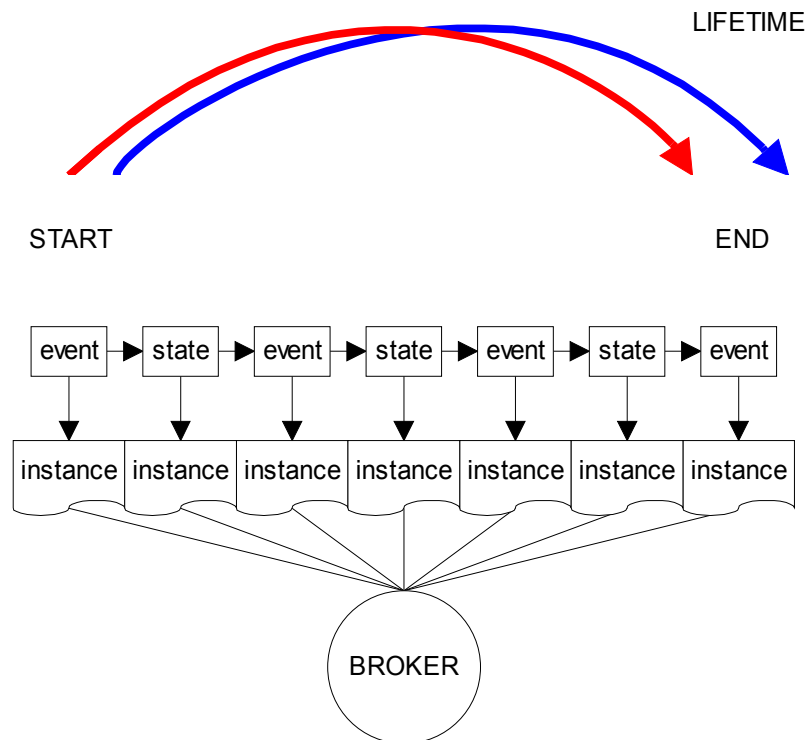
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169 Many practical actions in the Internet service would be impossible without different broker systems.

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171 [Continues on the next page]

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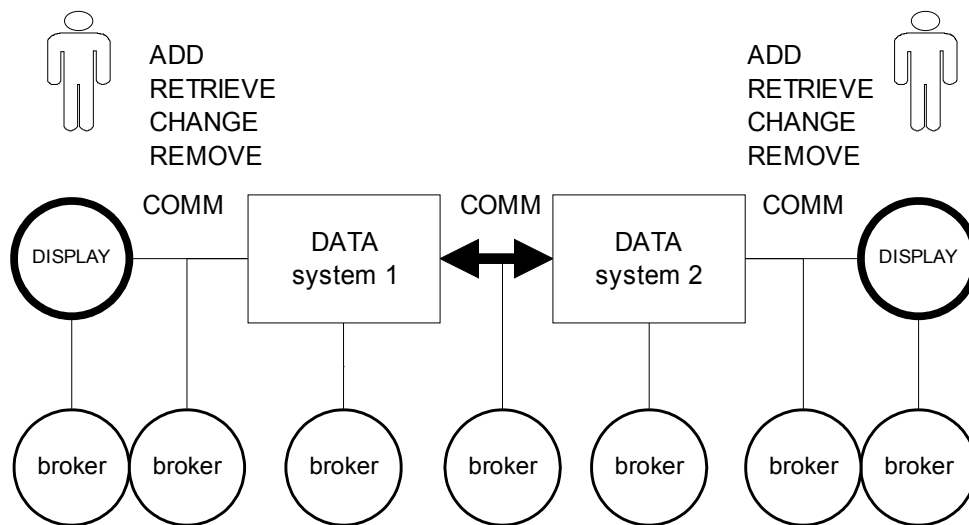
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Internet filtering as one broker system

Now we can create a broker system for Internet filtering:

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- filtering in the data system itself
- filtering of the retrieving information from the data system
- filtering of the changing information from the data system
- filtering of the adding information from the data system
- filtering of the removing information from the data system
- filtering between communications between to data system
- filtering in the communications network between two data systems
- filtering in the display computer
- filtering of the retrieving information in the display computer
- filtering of the changing information in the display computer
- filtering of the adding information in the display computer
- filtering of the removing information in the display computer



195
196

197 Now we can move on with different options for broker systems.

198

199 **Filtering in the data system itself**

200

201 When thinking in practical terms, this option has some problems:

202

- 203 – in many cases the registration process for a data system is open for everyone
- 204 – there can not be total guarantee of real identity of real users of the systems

205

206 In some systems the actual identity of the user is checked when registering to the system, meaning
207 communication with the system of holding verified identities.

208

209

Analysis:

210

211 In Internet terms, the best way for actual data systems filters would be blocking of malicious
212 web page addresses. If a malicious web page address is added to a data system, there should
213 be a filter, which checks the validity of every added web page address.

214

214 **Filtering the communication between data systems**

215

216 In Internet terms, this would mean filtering communications between different ISPs (internet
217 service providers), since in practical terms many systems are using communication networks “as-is”
218 without knowing the technical details about communications networks.

219

220 In practical terms this broker system between ISPs would mean very massive systems, since the
221 amount of internet communications is growing every year. An average end user might not even
222 know about these systems.

223

224 [Continues on the next page]

225

226 Filtering communications between the display (computer) and internet service provider (ISP)

227

228 In internet terms, this would mean filtering communications the end users' computers and the
229 servers of the ISP (internet service provider).

230

231 In reality, there should be a filtering option, where the filtering is done in the servers of the internet
232 service provider. Again in reality, the knowledge level of an average end user is so varied, that
233 leaving all filtering options to end user will cause real problems.

234

235 Filtering communications in the display (computer) itself

236

237 In this option, there is filtering systems in the computers of end users.

238

239 The problem with this option is, that average users might not understand anything about the
240 filtering systems in their computers. This might sound trivial, but in reality the knowledge level of
241 millions of user is very varied.

242

**243 What would be most feasible point of standardising Internet content and communications
244 filtering software and services ???**

245

246 After analysing different points in Internet communications and filtering options, there should be
247 some roadmap for standardising Internet filtering. Since I did not trust the knowledge level of
248 millions of end user, there might be the following standardisation efforts:

249

- 250 1) **Standardising the paper forms for end users**
- 251 2) **Standardising the web forms for end users**
- 252 3) **Standardising the content of information feeds between different stakeholders.**

253

254 Standardising the forms (paper and web) for end users

255

256 In Finland Finnish Federation for Communications and Teleinformatics ⁴ (FiCom), Consumer
257 Agency ⁵ and Finnish Communications Regulatory Authority ⁶ (FICORA) created more
258 standardised versions for standard form contracts. Naturally there is still variations between
259 operators, but the idea is to have less quarrel between end user customers and operators.

260

261 Based on this example, it might be feasible to have one standardised paper form for filtering when
262 making the initial contract between Internet service provider and the customer.

263

264 Also with further communications between customers and Internet service providers, there should
265 be always a link to the standardised web form form for filtering – when this web form link is always
266 visible in all communications to the customers, it can be reasoned that customer would eventually
267 have more knowledge about possibility of filtering.

4 <http://www.ficom.fi/inbrief/index.html>

5 <http://www.kulttajavirasto.fi/en-GB/>

6 <http://www.ficora.fi/en/etusivu.html>

268

269 Also, when the paper forms and web forms are standardised, the same form model should be usable
 270 in the actual filtering programs in the end users' computers.

271

272 In practical reality it can be said, that Finnish customers were bombarded with different sets of
 273 standard form contract models, even though all standard form contract models contained the same
 274 information based on the law and case law.

275

276 In the similar way, it will be difficult for end users, if they are bombarded with different sets of
 277 forms related to Internet filtering. Therefore I propose some practical measures:

278

279 **1) There should be measures to really have highly readable standard contract**
 280 **forms related to Internet filtering**

281 **2) There should be different logotypes for different filtering measures.**

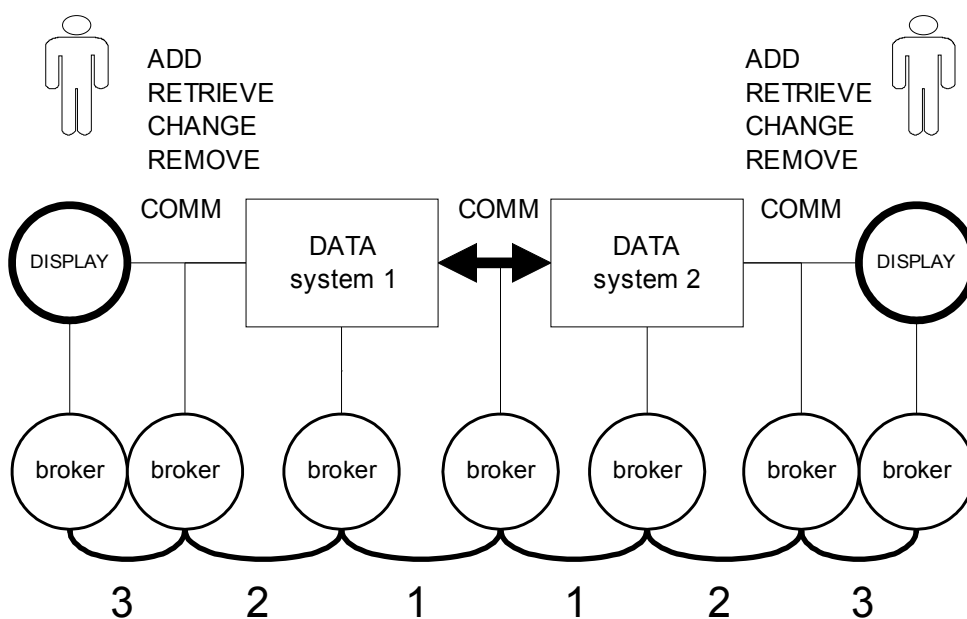
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283 **Standardising the content of information feeds between different stakeholders**

284

285 When thinking of transmitting filtering information between systems, it will lead to standardisation
 286 of information feeds between different stakeholders.

287



288

289 1) The Internet service providers can create their own information feeds for transmitting
 290 information about filtering

291 2) The Internet service providers need filtering information to keep their own internet filters
 292 up-to-date

293 3) The programs in end users' computer need filtering information to keep filtering working.

294 4) (Not necessarily the XML dialects are the best way of transmitting filtering information).

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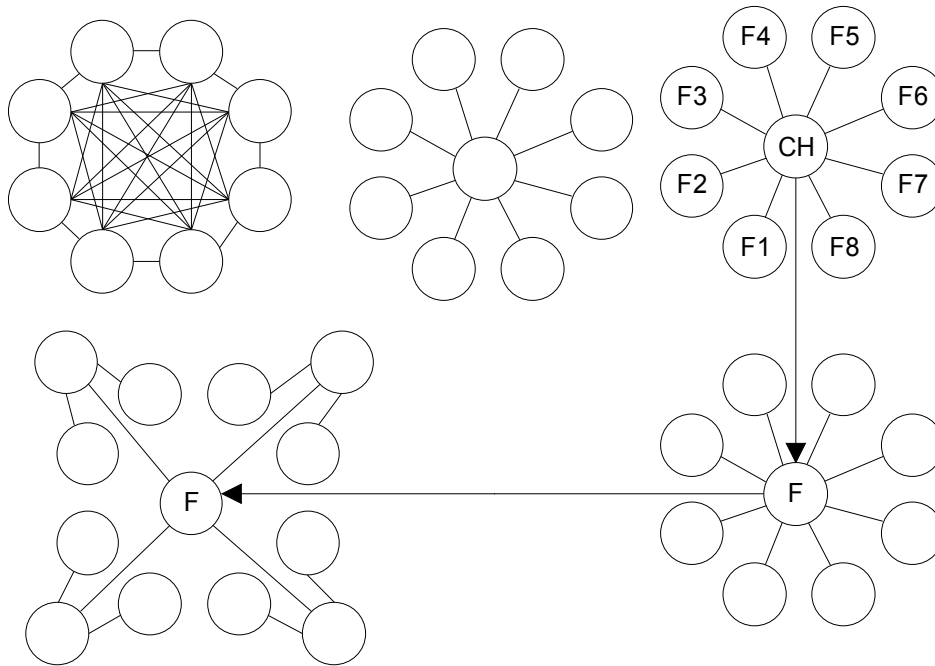
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It can be said that once again extreme options are many-to-many communications and one-to-many communications. In practical reality there would be several central hubs (CH), which can give information feed to next central hubs.



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Since the reality will be complex, there should be different standardised feeds:

- 1) **mass imports / mass exports about filtering**
- 2) **very tiny changes in filtering, possibly individually tailored**
- 3) **and between these two extremes.**

Good luck !!!

I have followed standardisation for some time, and standardisation is never easy, and will never be easy. Hopefully this opinion did trigger some thinking.

Jukka Rannila

citizen of Finland

signed electronically

ANNEX 1

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7 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.