

1

2 TO:

3 Department of Premier and Cabinet  
4 (Victoria / Australia)

5

6 Via Engage Victoria web page:

7 <https://engage.vic.gov.au/open-data-policy-update>

8

9

10 First of all, a lot of thanks to Department of Premier and Cabinet for organising this important  
11 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.

22

23 Annex 1 holds information about previous Australian consultations.

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

25

26

27

28

29 Best Regards,

30

31

32

33 Jukka S. Rannila

34 citizen of Finland

35

36 signed electronically

37

38

39 [Continues on the next page]

40

41

**42 Previous opinions – many opinions related to information technology**

43

44 General page for my previous opinions is following:

45 [www.jukkarannila.fi/lausunnot.html](http://www.jukkarannila.fi/lausunnot.html)

46

**47 Previous Australian consultations**

48

49 I have written several opinions based on previous Australian consultations.

50

51 **Annex 1** contains information about previous Australian consultations and my previous opinions.

52

53 I have repeated the same issues several times based on previous consultations.

54

55 Consultation document (DataVic Access Policy - Review and Recommendations, page 8) contains  
56 following text:

57

58 **Management of data and information is important for agencies. PAEC found that there**  
59 **is a growing volume of administrative overhead relating to policy and process for**  
60 **agencies in adhering to relevant standards. PAEC called for DPC to ‘ensure that**  
61 **information management guidance and standards supplied to departments and**  
62 **agencies are clear, relevant, do not duplicate existing documentation and kept to a**  
63 **minimum’.**

64

65 **PAEC: Public Accounts and Estimates Committee**66 **DPC: Department of Premier and Cabinet**

67

**68 Just one issue based on this consultation / Open horizontal standards**

69

70 This is opinion is about different standards and especially about open horizontal standards.

71

**72 About different standards**

73

74 I have proposed several times to use *open horizontal standards* when developing different  
75 information system.

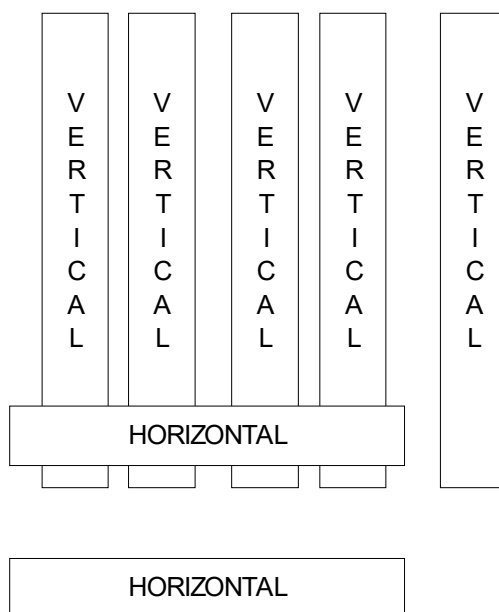
76

**77 Favouring open standards / Favouring horizontal standards**

78

79

80 [Continues on the next page]



81  
82

83 There are differences between horizontal and vertical standards. A simple example is naturally  
84 email solutions. There are several vertical standards when creating technically email solutions. Then  
85 there are horizontal standards which enable sending messages between technically different email  
86 solutions.

87

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

89

90 **Proposal: Using horizontal standards could be favoured when creating different  
91 information systems.**

92

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

95

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

97

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

99

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

102

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

105

106 Here we can note some problems:

107

108

- 109 • some systems are based on **de-facto** standards
- 110 • some systems are based on **de-jure** standards
- 111 • there can be confrontations between **de-facto** and **de-jure** standards
- 112 • there can be a monopoly situation in some domain
- 113 • some standards may inhibit possible actions of some stakeholders
- 114 • there can be a standard war on some domains
- 115 • standards have different life-cycles
- 116 • systems have different life-cycles
- 117 • there can be mismatches between different life-cycles
- 118 • there can be failed standards
- 119 • there can be deprecated standards.

120

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

125

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

132

133 There are different standards setting organisations on the information technology field. One list <sup>1</sup> of  
134 these standards setting organisations is provided by ConsortiumInfo.org.

135

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

139

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

142

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

145

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

147

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

150

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

1 Standard Setting Organizations and Standards List, [www.consortiuminfo.org/links/linksall.php](http://www.consortiuminfo.org/links/linksall.php)

153

154

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

155

156

157

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

158

159

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

160

161



162

163

I have advocated usage of web feeds on several previous opinion documents. Actually there are two standards for web feeds: RSS<sup>2 3</sup> and Atom<sup>4 5 6</sup>.

164

165

166

167

**Proposal: Web feeds could be advocated when developing different informations systems.**

168

169

170

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

171

172

173

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

174

175

176

177

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

178

179

180

181

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

182

183

184

185

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

186

187

188

[Continues on the next page]

189

190

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

191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238

## ANNEX 1

General page for my previous opinions is following:

[www.jukkarannila.fi/lausunnot.html](http://www.jukkarannila.fi/lausunnot.html)

### **Information about previous Australian consultations:**

EN: Opinion 54: Government Content Management System

[http://www.jukkarannila.fi/lausunnot.html#nro\\_54](http://www.jukkarannila.fi/lausunnot.html#nro_54)

EN: Opinion 56: National Identity Proofing Guidelines

[http://www.jukkarannila.fi/lausunnot.html#nro\\_56](http://www.jukkarannila.fi/lausunnot.html#nro_56)

EN: Opinion 57: Updating the Commonwealth Procurement Rules

[http://www.jukkarannila.fi/lausunnot.html#nro\\_57](http://www.jukkarannila.fi/lausunnot.html#nro_57)

EN: Opinion 72: Queensland biofuel mandate

[http://www.jukkarannila.fi/lausunnot.html#nro\\_72](http://www.jukkarannila.fi/lausunnot.html#nro_72)

EN: Opinion 73: Financial / Conceptual Frameworks

[http://www.jukkarannila.fi/lausunnot.html#nro\\_73](http://www.jukkarannila.fi/lausunnot.html#nro_73)

EN: Opinion 78: Consumer Complaints Register (NSW)

[http://www.jukkarannila.fi/lausunnot.html#nro\\_78](http://www.jukkarannila.fi/lausunnot.html#nro_78)

EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015

[http://www.jukkarannila.fi/lausunnot.html#nro\\_79](http://www.jukkarannila.fi/lausunnot.html#nro_79)

EN: Opinion 85: Regulatory options for automated vehicles

[http://www.jukkarannila.fi/lausunnot.html#nro\\_85](http://www.jukkarannila.fi/lausunnot.html#nro_85)

EN: Opinion 87: Assessing privacy and big data on the Internet

[http://www.jukkarannila.fi/lausunnot.html#nro\\_87](http://www.jukkarannila.fi/lausunnot.html#nro_87)

EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)

[http://www.jukkarannila.fi/lausunnot.html#nro\\_90](http://www.jukkarannila.fi/lausunnot.html#nro_90)

EN: Opinion 103: About lobbying - New South Wales

[http://www.jukkarannila.fi/lausunnot.html#nro\\_103](http://www.jukkarannila.fi/lausunnot.html#nro_103)

EN: Opinion 115: Framework for Secondary Use of My Health Record Data

[http://www.jukkarannila.fi/lausunnot.html#nro\\_115](http://www.jukkarannila.fi/lausunnot.html#nro_115)

EN: Opinion 117: The Digital Economy: Opening up the conversation

[http://www.jukkarannila.fi/lausunnot.html#nro\\_117](http://www.jukkarannila.fi/lausunnot.html#nro_117)

[Continues on the next page]

239

240

**ANNEX 2**

241 DISCLAIMERS

242

243 Legal disclaimer:

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

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

249

250 Political disclaimer:

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

254

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

259

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

261

262 Content of web pages:

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

269

270 Use of broken English

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

273

274 COPYRIGHT

275

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

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

280 The English explanation is on the following web page:

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

282



283

284

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

287

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

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