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TO: European Commission

Document reference: Ref. Ares(2020)1846831 – 31/03/2020
laying down the technical specifications of data requirements for the topic "ICT usage and e-commerce" for the reference year 2021, pursuant to Regulation (EU) 2019/2152 of the European Parliament and of the Council

First of all, a lot of thanks to European Commission for organising this important 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.

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

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

Annex 2 holds information about copyright, licence and disclaimers.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

40

41 About previous consultations / Repeating several issues

42

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

46

47 Highlighting only some issues

48

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

53

54 More and more identifiers (ID)

55

56 In the previous consultations there has been discussion about different identifiers (ID) in different
57 systems. It can be noted from the previous opinions, that there will be several and different
58 identifiers (ID) for different levels. At the European Union level there can be several identifiers
59 (ID), e.g. following:

60

- 61 * global identifiers (ID)
- 62 * EU-wide identifiers (ID)
- 63 * general member state identifiers (ID)
- 64 * several identifiers (ID) in member states.

65

66 Proposal: There could be a systematic review of different identifiers (ID).

67

68 It can be noted, that some member states (EU) are federations, and different federal states can have
69 their own identifiers (ID).

70

71 Examples of these identifiers are following:

72

- 73 1) Facebook ID for an individual person
- 74 2) Facebook ID for the individual up-dates of individuals
- 75 3) Data Universal Numbering System (D-U-N-S)
- 76 4) Reuters instruments codes (RICs)
- 77 5) Social security code for individual citizens in the European Union member states
- 78 6) Business identity code for a company in an European Union member state
- 79 7) Value added tax code for a company in an European Union member state.

80

81 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
82 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
83 of using IDs from privately owned information systems.

84

85

86 The information systems were established at different times and have since been modified on legal
87 and operational grounds.

88

89 **More new identifiers (ID)?**

90

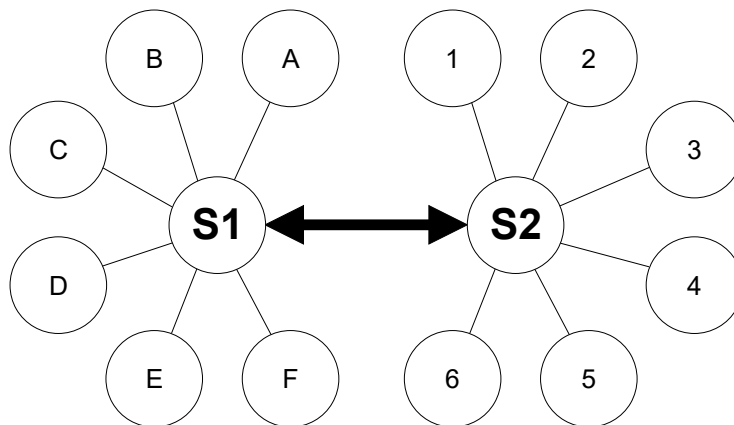
91 The current reality is, that there will be more and more IDs, since digitalisation of different areas
92 will result new IDs and/or combination of new and old IDs.

93

94 The creation YET another public ID is not always organised by the European Union, and in some
95 cases the European Union (and member states) just have to accept the reality of some of those
96 public IDs – in some cases even private IDs are the norm. The Reuters Instruments Codes (RICs) is
97 an example of a near monopoly situation, and some of current private IDs might constitute (near)
98 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
99 General, and it will be interesting to see possible new cases related to private IDs.

100

1-2



101

102

103

Note: Digitalisation of everything means more identifiers (ID).

104

105

Note: All new identifiers (ID) mean more work for developing existing and new informations systems.

106

107

108

Note: There can be new stakeholder groups in the near/distant future which mean more identifiers (ID).

109

110

111

Proposal: There could be some assessment(s) based on different versions of different identifiers (ID).

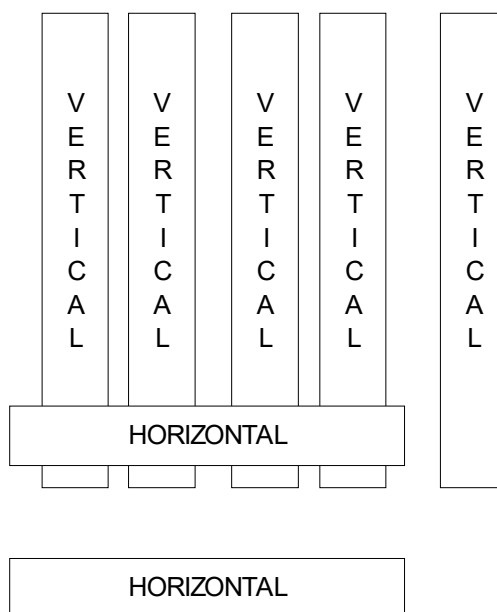
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114

Favouring open standards / Favouring horizontal standards

115



116
117

118 There are differences between horizontal and vertical standards. A simple example is naturally
119 email solutions. There are several vertical standards when creating technically email solutions. Then
120 there are horizontal standards which enable sending messages between technically different email
121 solutions.

122

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

124

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

127

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

130

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

132

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

134

135 **Proposal: There could be different standardisation efforts to horizontal standards and**
136 **vertical standards.**

137

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

140

141 Here we can note some problems:

142

143

- 144 • some systems are based on **de-facto** standards
- 145 • some systems are based on **de-jure** standards
- 146 • there can be confrontations between **de-facto** and **de-jure** standards
- 147 • there can be a monopoly situation in some domain
- 148 • some standards may inhibit possible actions of some stakeholders
- 149 • there can be a standard war on some domains
- 150 • standards have different life-cycles
- 151 • systems have different life-cycles
- 152 • there can be mismatches between different life-cycles
- 153 • there can be failed standards
- 154 • there can be deprecated standards.

155

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

160

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

167

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

170

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

174

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

177

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

180

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

182

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

185

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

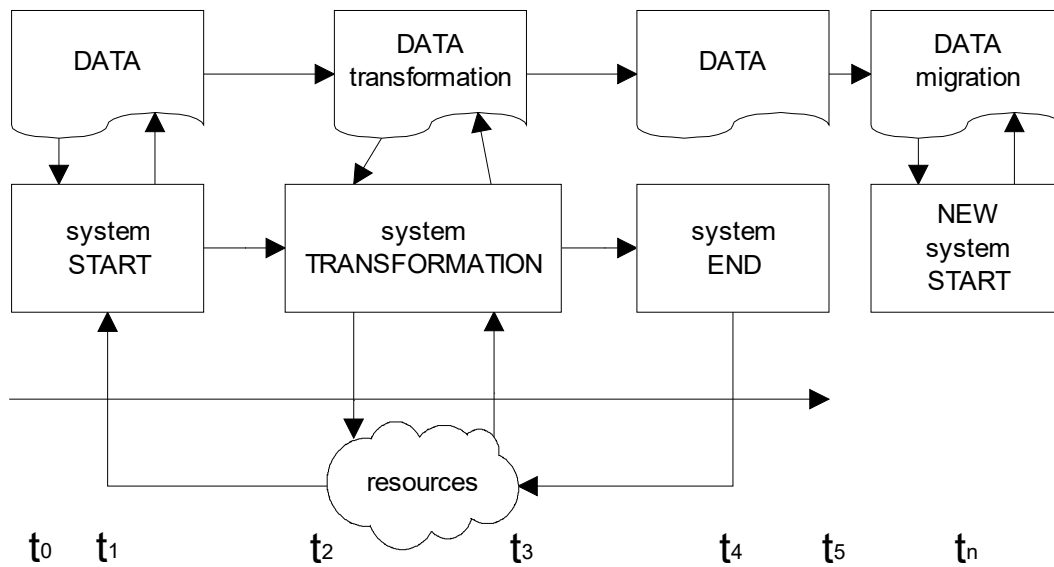
1 Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php

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

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

System timeline – national systems

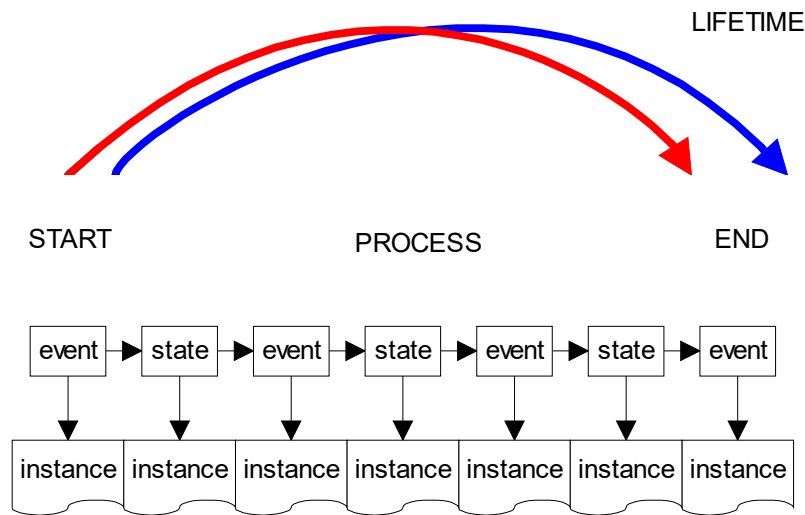


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Proposal: Different information systems (EU-wide systems and member state systems) could be assessed based on informations system lifetime.

Start, end, events and lifetime

[Continues on the next page]



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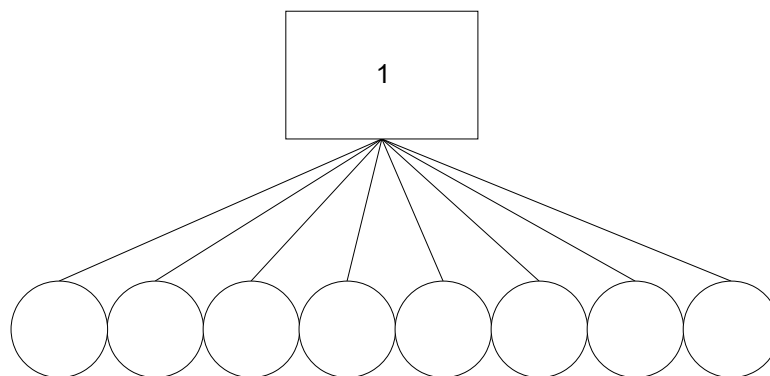
208 Information systems contains information about events and states which means different processes
209 during the lifetime of a system. Like mentioned before different systems can be assessed based on
210 lifetime.

211
212 **Assessing different application programming interface (APIS)**

213
214 There can be several APIs implemented in different information system. The natural problem with
215 APIs is timeline of different systems which implement different APIs. There can be new and old
216 systems which implement different APIs.

217
218 **Proposal: Different information systems (EU-wide systems and member state systems)**
219 **could be assessed based on *implementation of different APIs.***

220
221 Here can be noted that there can several APIs implemented in different information systems.
222



223
224

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

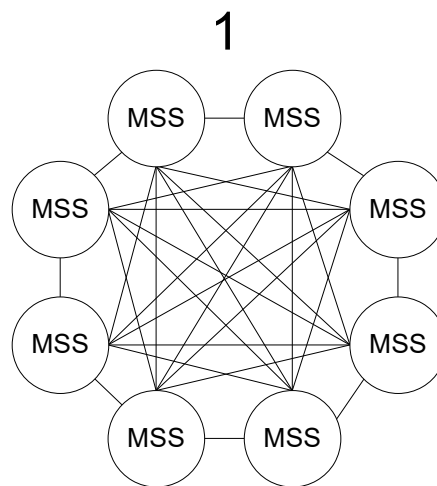
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Proposal: Different API versions could be assessed very carefully.

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

EU-wide level?

I have noted several times that different member state systems (MSS) can interlinked in many ways. This means that co-operation with European Union systems means a lot of work. This leads to the question of a European Contact Point (EUCP) for different member state systems (MSS).



MSS = Member State System

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There are 27 member states (European Union) at the moment. In reality there are unique situations with information systems in different member states. In some cases information systems can be implemented based on complex system-to-system connections. Complex system-to-system connections means a lot of work when there are changes in some systems.

Naturally there could be direct contacts between different member state systems (MSS) and European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large number of different member state system. Based on 28 member state systems there could be hundreds of connections:

$$27 \times 10 = 270 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$$

$$27 \times 20 = 540 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$$

$$27 \times 30 = 810 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$$

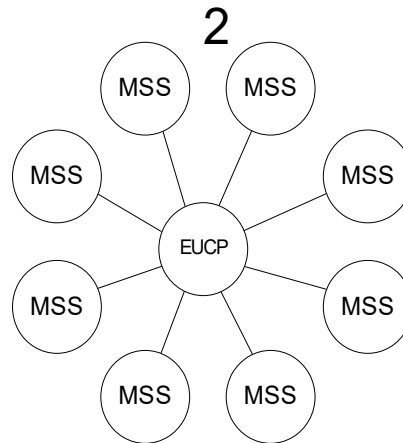
Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations

259 with member state systems in member states. Therefore member state contact points (MCP) can
 260 reduce the complexity with European Union contact point (EUCP)

261

262 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 263 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

264



265

266 **MSS = Member State System, EUCP = European Contact Point**

267

268 In the current situation, European Union member states (and some co-operation states) have their
 269 own internal IDs for several information systems. Also, the members states organised as a
 270 federation have their own internal problems with state-level IDs.

271

272 Based on those calculations there could be a lot of direct connections to the European contact point.
 273 Number of those connections can be overwhelming. The situation between member states can vary
 274 in many ways. So there can different and unique systems between member states.

275

276 On the other hand, there are some working examples of joined or federated EU-wide registers.
 277 However, the amount of administration and needed legally binding agreements is considerable.

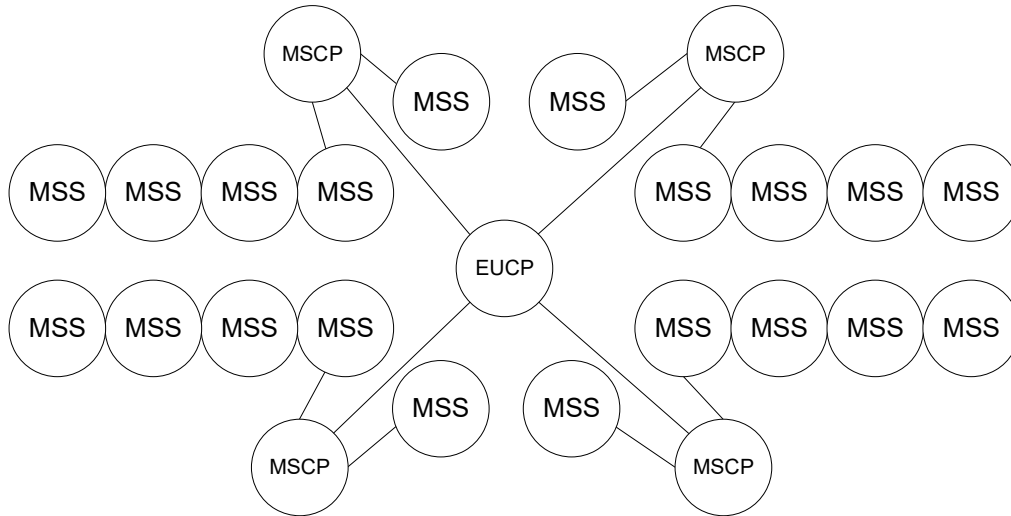
278

279 **Proposal : There could be one information system (member state contact point, MSCP)**
 280 **on member state level.**

281

282 [Continues on the next page]

3



MSS = Member State System

MSCP = Member State Contact Point, EUCP = European Contact Point

283

284

285

286

287 The solution can be, that member states have own Member State Contact Points (MSCP) and
 288 different state level systems are combined gradually. Then the member state system IDs can be used
 289 in the European Contact Point (EUCP).

290

291 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 292 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

293

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

299

300 **Proposal: Different member state systems could be consolidated based on limited**
 301 **number system-to-system connections.**

302

303 **Proposal: There could be some time frames for consolidating different member state**
 304 **systems (MSS) with member state contact points (MSCP).**

305

306 **Proposal: There could be some time frames for consolidating member state contact**
 307 **points (MSCP) with the European Union contact point (EUCP).**

308

309 **Proposal: One information system (member state contact point, MSCP) on member**
 310 **state level could handle system-to-system connections with the European Union level**
 311 **(European contact point).**

312
313 **Proposal: There could be some serious work for developing a standardised member**
314 **state contact point (MSCP).**

315
316 **Proposal: After developing a standardised member state contact point (MSCP)**
317 **different member states could consolidate their systems (MSS ↔ MSCP).**

318
319 **Proposal: European Union contact point (EUCP) and member state contact points**
320 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European**
321 **Union level.**

322
323 Naturally we have to note that developing a standardised member state contact point (MSCP) means
324 more work. On the other hand a standardised member state contact point (MSCP) could handle
325 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
326 states may have more systems than other member states. We have to note that there are different
327 systems based on several technological solutions.

328
329 **Some issues to be consider – public systems and private systems?**

330
331 Here we can note following combinations:

- 332 • public ↔ public
- 333 • private ↔ private
- 334 • private ↔ public
- 335 • (public ↔ private)

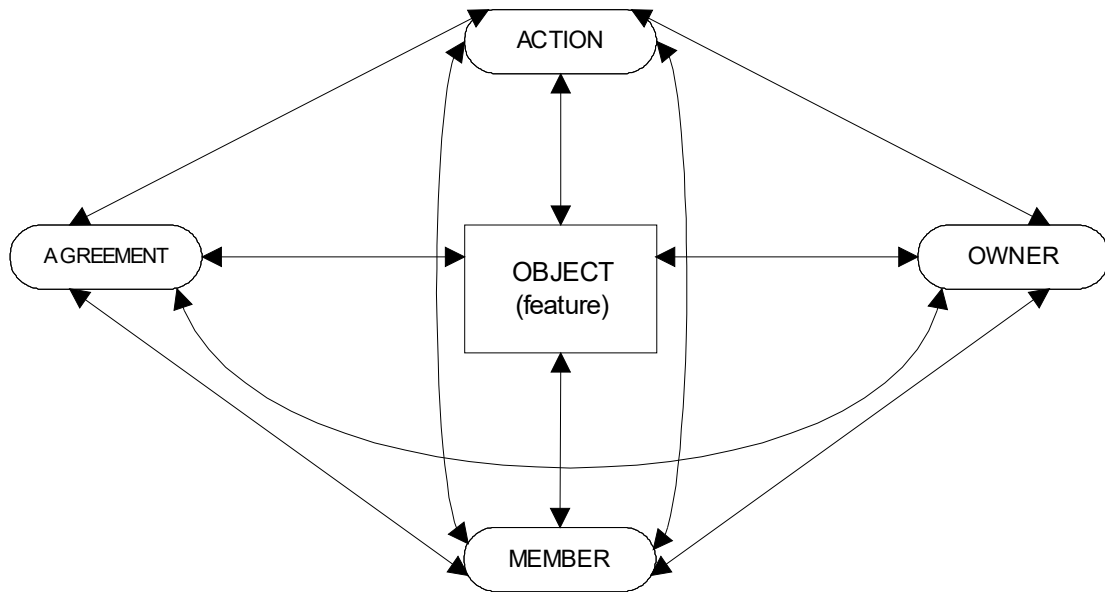
336
337 Based on previous considerations there could be some efforts:

- 338
- 339 • There could be some adjustments for (public ↔ public) public information systems.
- 340 • There could be some adjustments for (private ↔ private) private information
- 341 systems.
- 342 • There could be some adjustments for (private ↔ public) cooperation between public
- 343 and private information systems.

344
345 **There can be some examples:**

- 346
- 347 **a) There could be some regulations for providing interfaces (private, public)**
- 348 **b) There could be some regulations for document formats (private, public)**
- 349 **c) There could be some regulations for transmitting data between different systems**
- 350 **d) There could be some regulations for using databases (private, public)**
- 351 **e) There could be some regulations for using programs (private, public)**
- 352 **f) There could be some regulations for retrieving information from different systems.**

353



Note: The relations between different aspects of information systems can result rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.

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Here we can note the difference between owners, agreements and members. In reality ownerships agreements and memberships cause very complex networks, and those networks are changing all the time: divisions, mergers, ownership changes, agreement changes, cooperation with other entities, life-cycles, etc.

Here we can note that ownership, agreement and membership are interlinked in different ways. Generally speaking average usage of a system means an unique combination of ownership, agreement and membership. When everything works fine there are not problems. However changes with ownership, agreement and membership can result difficult situations.

In the previous consultations I have advocated following solution as the maximum solution:

- * public sector institute owns the machinery and processor of the information system
- * the machinery and processor are based on relevant open standards
- * the operating system is based on an open-source solution
- * public sector institute owns the source code of the information system
- * public sector institute owns the database of the information system
- * the database is based on open-source solution and on relevant open standards
- * public sector institute owns all data in the information system.

[Continues on the next page]

	Owner? Member? Agreement?	Standards?	OPEN	CLOSED
1. Device / Machinery				
2. Operating system				
3. Program(s)				
4. Data models / Conceptual models				
5. Documents				
6. Databases				
7. Communications				
8. Retrieve / Interface / Display				
9. Add / Interface / Display				
10. Remove / Interface / Display				
11. Change / Interface / Display				

383

384 Naturally, there can be solutions, which are not based on the maximum solution. It can be
385 concluded, that this consultation is not (yet) about technical details.

386

387

388

389

Note: The relations between different aspects of information systems can result rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.

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



396

397

398

I have advocated usage of web feeds ² on several previous opinion documents. Actually there are

² https://en.wikipedia.org/wiki/Web_feed

400 two standards for web feeds: RSS^{3 4} and Atom^{5 6 7}.

401

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

404

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

407

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

411

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

413

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

416

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

421

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425 **Good luck!!!**

426

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

429

430

431 [Continues on the next page]

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

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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

- 477
478 EN: Opinion 19: Official Acknowledgement by the Commission
479 http://www.jukkarannila.fi/lausunnot.html#nro_19
480
481 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
482 http://www.jukkarannila.fi/lausunnot.html#nro_20
483
484 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
485 http://www.jukkarannila.fi/lausunnot.html#nro_21
486
487 EN: Opinion 23: Public consultation on the review of the European Standardisation System
488 http://www.jukkarannila.fi/lausunnot.html#nro_23
489
490 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
491 http://www.jukkarannila.fi/lausunnot.html#nro_27
492
493 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
494 http://www.jukkarannila.fi/lausunnot.html#nro_28
495
496 EN: Opinion 30: Internet Filtering
497 http://www.jukkarannila.fi/lausunnot.html#nro_30
498 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
499
500 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
501 http://www.jukkarannila.fi/lausunnot.html#nro_32
502
503 EN: Opinion 34: REMIT Registration Format
504 http://www.jukkarannila.fi/lausunnot.html#nro_34
505 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
506
507 EN: Opinion 35: Exploiting the employment potential of the personal and household services
508 http://www.jukkarannila.fi/lausunnot.html#nro_35
509
510 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
511 http://www.jukkarannila.fi/lausunnot.html#nro_37
512
513 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
514 http://www.jukkarannila.fi/lausunnot.html#nro_39
515
516 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
517 http://www.jukkarannila.fi/lausunnot.html#nro_40
518
519

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

⁹ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 520 EN: Opinion 41: AT.39398: observations on the proposed commitments
521 http://www.jukkarannila.fi/lausunnot.html#nro_41
522
- 523 EN: Opinion 42: Opening up Education
524 http://www.jukkarannila.fi/lausunnot.html#nro_42
525
- 526 EN: Opinion 43: Publication of extracts of the European register of market participants
527 http://www.jukkarannila.fi/lausunnot.html#nro_43
528 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
529
- 530 EN: Opinion 44: Evaluation policy guidelines
531 http://www.jukkarannila.fi/lausunnot.html#nro_44
532
- 533 EN: Opinion 45: About ICT standardisation
534 http://www.jukkarannila.fi/lausunnot.html#nro_45
535
- 536 EN: Opinion 46: Review of the EU copyright rules
537 http://www.jukkarannila.fi/lausunnot.html#nro_46
538
- 539 EN: Opinion 51: European Area of Skills and Qualifications
540 http://www.jukkarannila.fi/lausunnot.html#nro_51
541
- 542 EN: Opinion 52: Trusted Cloud Europe Survey
543 http://www.jukkarannila.fi/lausunnot.html#nro_52
544
- 545 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
546 http://www.jukkarannila.fi/lausunnot.html#nro_53
547 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
548
- 549 EN: Opinion 55: European Energy Regulation
550 http://www.jukkarannila.fi/lausunnot.html#nro_55
551 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
552
- 553 EN: Opinion 59: Green paper on mobile Health
554 http://www.jukkarannila.fi/lausunnot.html#nro_59
555
- 556 EN: Opinion 60: Cross-border inheritance tax problems within the EU
557 http://www.jukkarannila.fi/lausunnot.html#nro_60
558
- 559 EN: Opinion 61: European Register of Products Containing Nanomaterials
560 http://www.jukkarannila.fi/lausunnot.html#nro_61
561
- 562 EN: Opinion 64: Corporate Social Responsibility - European Commission
563 http://www.jukkarannila.fi/lausunnot.html#nro_64
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- 565 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
566 http://www.jukkarannila.fi/lausunnot.html#nro_66
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- 568 EN: Opinion 68: European Network Code Stakeholder Committees
569 http://www.jukkarannila.fi/lausunnot.html#nro_68
570 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
571
- 572 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
573 http://www.jukkarannila.fi/lausunnot.html#nro_71
574 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
575
- 576 EN: Opinion 74: Enabling the Internet of Things
577 http://www.jukkarannila.fi/lausunnot.html#nro_74
578 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ¹⁰
579
- 580 EN: Opinion 80: Mandatory Transparency Register
581 http://www.jukkarannila.fi/lausunnot.html#nro_80
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- 583 EN: Opinion 84: Revision of the European Interoperability Framework
584 http://www.jukkarannila.fi/lausunnot.html#nro_84
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- 586 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
587 http://www.jukkarannila.fi/lausunnot.html#nro_86
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- 589 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
590 http://www.jukkarannila.fi/lausunnot.html#nro_88
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- 592 EN: Opinion 89: BEREC Guidelines for net neutrality rules
593 http://www.jukkarannila.fi/lausunnot.html#nro_89
594 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
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- 596 EN: Opinion 93: Safety of apps and other non-embedded software
597 http://www.jukkarannila.fi/lausunnot.html#nro_93
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- 599 EN: Opinion 95: Targeted consultation on eForms
600 http://www.jukkarannila.fi/lausunnot.html#nro_95
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- 602 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
603 http://www.jukkarannila.fi/lausunnot.html#nro_97
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- 605 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
606 http://www.jukkarannila.fi/lausunnot.html#nro_98
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¹⁰ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 609 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
610 Regulators. Recast
611 http://www.jukkarannila.fi/lausunnot.html#nro_99
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- 613 EN: Opinion 100: Protection of personal data (EU)
614 http://www.jukkarannila.fi/lausunnot.html#nro_100
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- 616 EN: Opinion 101: Governance of the Energy Union
617 http://www.jukkarannila.fi/lausunnot.html#nro_101
618
- 619 EN: Opinion 102: Smart Wearables
620 http://www.jukkarannila.fi/lausunnot.html#nro_102
621
- 622 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
623 (ENISA)
624 http://www.jukkarannila.fi/lausunnot.html#nro_106
625
- 626 EN: Opinion 108: Single Digital Gateway
627 http://www.jukkarannila.fi/lausunnot.html#nro_108
628
- 629 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
630 http://www.jukkarannila.fi/lausunnot.html#nro_110
631
- 632 EN: Opinion 111: Interoperability of information systems for migration and security
633 http://www.jukkarannila.fi/lausunnot.html#nro_111
634
- 635 EN: Opinion 113: Transform of health and care
636 http://www.jukkarannila.fi/lausunnot.html#nro_113
637
- 638 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
639 Internet
640 http://www.jukkarannila.fi/lausunnot.html#nro_114
641 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
642
- 643 EN: Opinion 118: Fake news and online disinformation
644 http://www.jukkarannila.fi/lausunnot.html#nro_118
645
- 646 EN: Opinion 119: European Social Security Number
647 http://www.jukkarannila.fi/lausunnot.html#nro_119
648
- 649 EN: Opinion 120: European Labour Authority
650 http://www.jukkarannila.fi/lausunnot.html#nro_120
651
- 652 EN: Opinion 121: 2nd Data Package
653 http://www.jukkarannila.fi/lausunnot.html#nro_121

- 654
655 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
656 Cybersecurity Research and Competence Centre
657 http://www.jukkarannila.fi/lausunnot.html#nro_122
658
- 659 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
660 THE COUNCIL on the re-use of public sector information (recast)
661 http://www.jukkarannila.fi/lausunnot.html#nro_123
662
- 663 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
664 http://www.jukkarannila.fi/lausunnot.html#nro_125
665
- 666 EN: Opinion 128: Summertime arrangements
667 http://www.jukkarannila.fi/lausunnot.html#nro_128
668
- 669 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
670 http://www.jukkarannila.fi/lausunnot.html#nro_129
671
- 672 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
673 http://www.jukkarannila.fi/lausunnot.html#nro_132
674
- 675 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
676 ("eForms")
677 http://www.jukkarannila.fi/lausunnot.html#nro_133
678
- 679 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
680 UCC
681 http://www.jukkarannila.fi/lausunnot.html#nro_134
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- 683 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
684 http://www.jukkarannila.fi/lausunnot.html#nro_139
685
- 686 EN: Opinion 141: Farm Accountancy Data Network
687 http://www.jukkarannila.fi/lausunnot.html#nro_141
688
- 689 EN: Opinion 142: Horizon Europe (two consultations)
690 http://www.jukkarannila.fi/lausunnot.html#nro_142
691
- 692 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
693 (evaluation)
694 http://www.jukkarannila.fi/lausunnot.html#nro_144
695
- 696 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
697 http://www.jukkarannila.fi/lausunnot.html#nro_146
698 NOTE: Organised by the European Committee for Standardization (CEN)

699

700 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems

701 http://www.jukkarannila.fi/lausunnot.html#nro_147

702

703 EN: Opinion 152: Revision of the Non-Financial Reporting Directive

704 http://www.jukkarannila.fi/lausunnot.html#nro_152

705

706 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation

707 http://www.jukkarannila.fi/lausunnot.html#nro_154

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711 My opinions to the previous and relevant consultations – there consultations were mostly organised

712 by the European Commission. General page to all consultations – both in English and in Finnish:

713 <http://www.jukkarannila.fi/lausunnot.html>

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718 [Continues on the next page]

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ANNEX 2

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722

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