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2 TO: [CNECT-FEEDBACK-EPRIVACY@EC.EUROPA.EU](mailto:CNECT-FEEDBACK-EPRIVACY@EC.EUROPA.EU)

3 European Commission

4 Directorate General for Communications Networks, Content & Technology (DG CONNECT)

5 25 Avenue Beaulieu

6 Unit H4 – Trust & Security

7 Brussels 1049 – Belgium

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9

10 **Public opinion on the Evaluation and Review of the ePrivacy Directive**

11

12 First of all, a lot of thanks to Directorate General for Communications Networks, Content &  
13 Technology (Unit H4) for organising this important consultation.

14

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

16

17 This opinion does not contain:

18 – any business secrets

19 – any trade secrets

20 – any confidential information.

21

22 This opinion is public.

23

24 Directorate General for Communications Networks, Content & Technology (Unit H4) can add the  
25 PDF file of this opinion to a relevant web page.

26

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

28 Annex 2 holds information about disclaimers and copyright.

29

30

31 Best Regards,

32

33

34

35 Jukka S. Rannila

36 citizen of Finland

37

38 signed electronically

39

40 [Continues on the next page]

41

42

43 **Some general notes**

44

45 On this document there are some additions for the answers given by the EUSurvey system. This  
46 opinion contains figures which are can not be added for the answers given by the EUSurvey system.

47

48 At the moment web page for this consultation worked.

49

50 Public Consultation on the Evaluation and Review of the ePrivacy Directive

51 [https://ec.europa.eu/digital-single-market/en/news/public-consultation-evaluation-and-](https://ec.europa.eu/digital-single-market/en/news/public-consultation-evaluation-and-review-eprivacy-directive)  
52 [review-eprivacy-directive](https://ec.europa.eu/digital-single-market/en/news/public-consultation-evaluation-and-review-eprivacy-directive)

53 **Deadline: 5 July 2016**

54

55 **Three consultations in Australia / Federal level and state level**

56

57 Interestingly there was three (open) consultations in Australia when writing this opinion:

58

59 Guide to big data and the Australian Privacy Principles

60 [https://www.oaic.gov.au/engage-with-us/consultations/guide-to-big-data-and-the-australian-](https://www.oaic.gov.au/engage-with-us/consultations/guide-to-big-data-and-the-australian-privacy-principles/)  
61 [privacy-principles/](https://www.oaic.gov.au/engage-with-us/consultations/guide-to-big-data-and-the-australian-privacy-principles/)

62 **Deadline: 25 July 2016**

63

64 Data Availability and Use

65 <http://www.pc.gov.au/inquiries/current/data-access/issues>

66 **Deadline: 29 July 2016**

67

68 Privacy Guidance – Identifiability

69 <http://www.haveyoursay.nsw.gov.au/consultations/privacy-guidance-identifiability/>

70 **Deadline: 31 July 2016**

71

72 Here we can note that privacy issues are important issue worldwide – e.g. in Australia.

73

74 **Proposal: Possibly Australian results could be assessed after this consultation.**

75

76 **More and more new identifiers (ID) / Challenges to privacy?**

77

78 In the previous consultations there has been discussion about different identifiers (ID) in different  
79 information systems. It can be noted from the previous opinions that there will be several and  
80 different identifiers (ID) for different levels. On the European Union level there can be several  
81 identifiers (ID), e.g. following:

82

83 \* global identifiers (ID)

84 \* EU-wide identifiers (ID)

85 \* general member state identifiers (ID)

86 \* several identifiers (ID) in member states.

87

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

90

91 Examples of these identifiers (ID) are following:

92

93 1) Facebook ID for an individual person

94 2) Facebook ID for the individual up-dates of individuals

95 3) Data Universal Numbering System (D-U-N-S)

96 4) Reuters instruments codes (RICs)

97 5) Social security code for individual citizens in the European Union member states

98 6) Business identity code for a company in an European Union member state

99 7) Value added tax code for a company in an European Union member state.

100

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

104

105 **Proposal: There could be a systematic review of different identifiers (ID) on different  
106 levels.**

107

108 **Proposal: Possible systematic review of different identifiers (ID) should assess different  
109 situations: member states (EU), European (inside EU and outside EU) and global.**

110

111 Different information systems have also internal identifiers (ID) and external identifiers (ID) for  
112 (possible) public usage. The added value for different stakeholders is provided by combination of  
113 different identifiers (ID) in a specific information system.

114

115 **Proposal: The could be some assessment(s) based on different versions of different  
116 identifiers (ID).**

117

118 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,  
119 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers  
120 (ID), but this consolidation means some serious technical and administrative actions.

121

122 **Proposal: Legacy identifiers (ID) could be assessed seriously.**

123

124 When information about relevant identifiers is collected, there could be a serious assessment of  
125 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,  
126 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

127

128 **Proposal: The nature of different identifiers (ID) could be assessed.**

129

130 **Proposal: There could be serious negotiations with some providers of identifiers (ID).**

131

132

133 In the European Union there has been different anti-trust cases which are related to different private  
134 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several  
135 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

136

### 137 **Standardisation efforts**

138

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

141

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

145

146 Here we can note some problems:

147

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

159

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

164

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

171

172 **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**  
173 **different organisations could be assessed carefully.**

174

### 175 **Horizontal and vertical standards?**

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

176

177 There are differences between horizontal and vertical standards. A simple example is naturally  
178 email solutions. There are several vertical standards when creating technically email solutions. Then  
179 there are horizontal standards which enable sending messages between technically different email  
180 solutions.

181

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

183

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

186

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

189

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

191

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

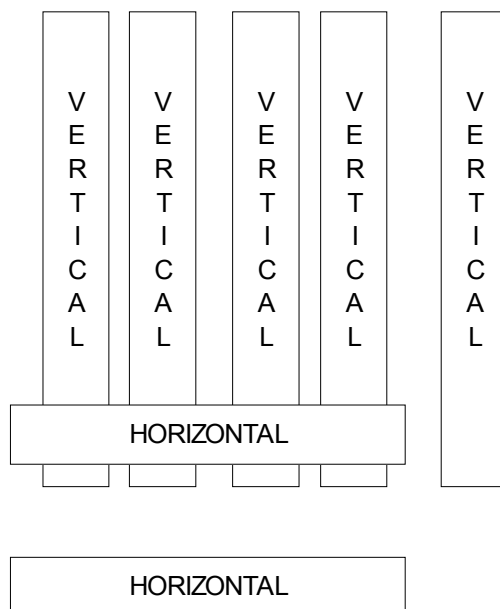
193

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

196

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

199



200

201

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

203

204 **Proposal: Some government agencies (e.g. European Union) could apply for**  
 205 **memberships of different standard setting organisations which develop especially**  
 206 **horizontal standards.**

207  
 208 **Proposal: Government agencies (e.g. European Union) should not be passive by-**  
 209 **standers when different horizontal standards are developed.**

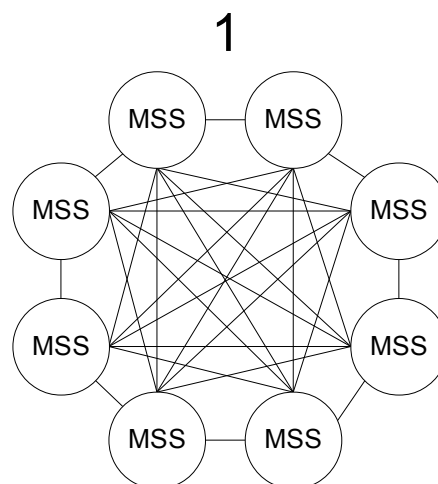
210  
 211 **Proposal: Government agencies (e.g. European Union) could financially support**  
 212 **development of horizontal standards.**

213  
 214 Here we can note that developing horizontal standards is very demanding compared to developing  
 215 vertical standards.

### 216 **Member state contact points (MSCP) and European Union contact points (EUCP)**

217  
 218  
 219 There are 28 member states (European Union) at the moment. In reality there are unique situations  
 220 with information systems in different member states. In some cases information systems can be  
 221 implemented based on complex system-to-system connections. Complex system-to-system  
 222 connections means a lot of work when there are changes in some systems.

223  
 224 **Proposal: Complex system-to-system connections implemented in information systems**  
 225 **could be assessed carefully.**

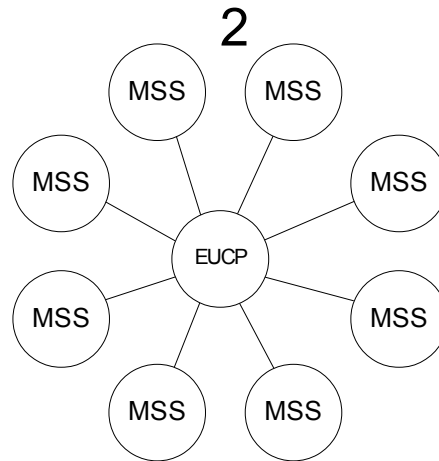


**MSS = Member State System**

226  
 227  
 228  
 229 There are 28 member states (European Union) at the moment. In reality there are unique situations  
 230 with information systems in different member states. In some cases information systems can be  
 231 implemented based on complex system-to-system connections. Complex system-to-system  
 232 connections means a lot of work when there are changes in some systems.

233  
 234 **Proposal: Complex system-to-system connections implemented in information systems**  
 235 **could be assessed carefully.**

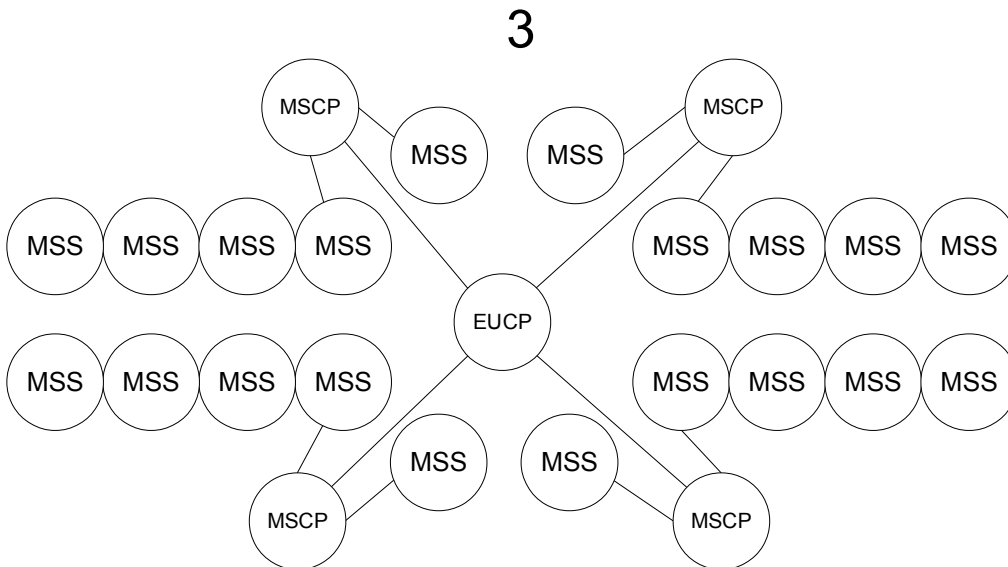
236  
 237 Public administrations are encouraged to reuse and share solutions and to cooperate in the  
 238 development of joint solutions when implementing European Public Services.



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

239  
 240  
 241  
 242 One option is to have a single European contact point for member state systems. Here we can  
 243 calculate connections based on number of information systems.

- 244
- 245  $28 \times 5 = 140$
- 246  $28 \times 10 = 280$
- 247  $28 \times 20 = 560$
- 248  $28 \times 30 = 840$



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

249  
 250  
 251  
 252

253 Based on those calculations there could be a lot of direct connections to the European contact point.  
254 Number of those connections can be overwhelming.

255

256 I have proposed several times creation of member state contact points which could handle different  
257 system-to-system connections on member state level. Then it can be easier to create connections  
258 between member state contact points and European contact point.

259

260 **Proposal: There could be one information system (member state contact point) on**  
261 **member state level.**

262

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

265

266 **Proposal: One information system (member state contact point) on member state level**  
267 **could handle system-to-system connections on the European Union level (European**  
268 **contact point).**

269

270 **Developing member state contact points (MSCP) and European Union contact points (EUCP)**

271

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

276

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

281

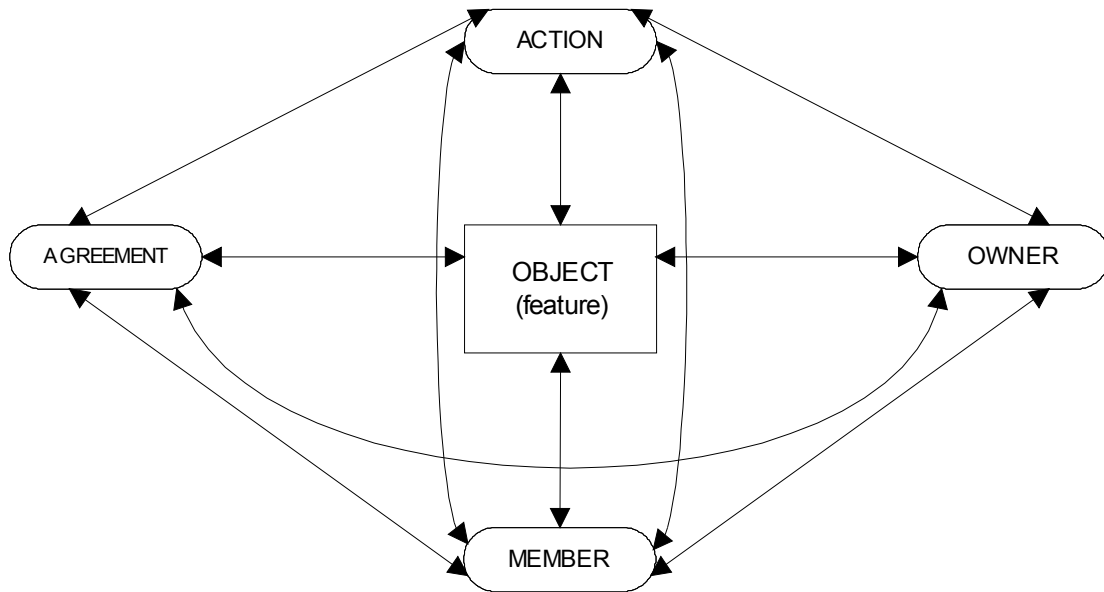
282 One issue for these contact points (MSCP and EUCP) is naturally ownership issues. Who could use  
283 and develop these these contact points?

284

285 [Continues on the next page]

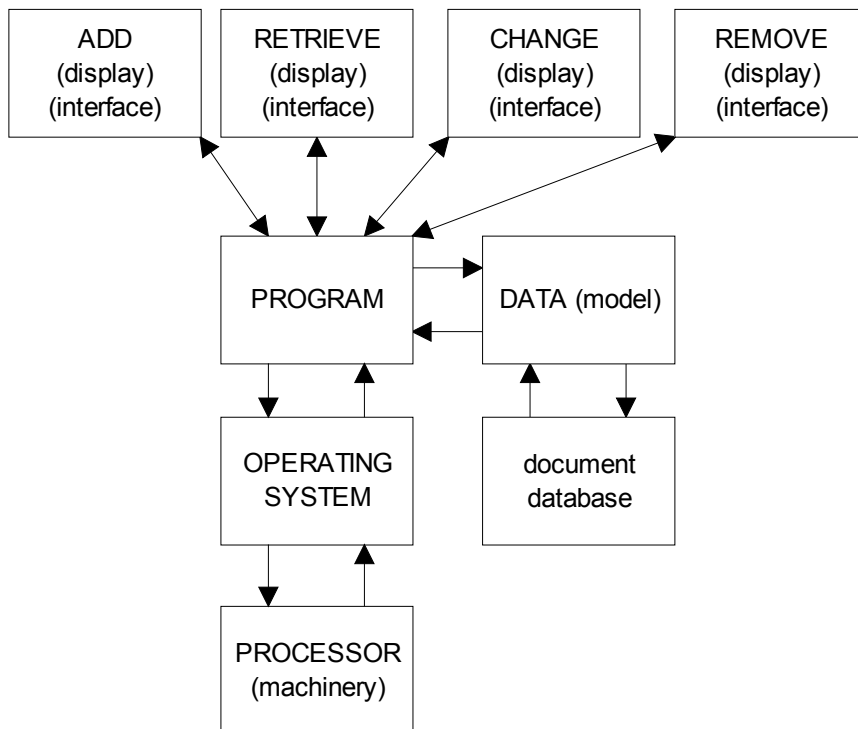
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Personally I have differentiated owner, members and agreements.



291  
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293  
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295

Generally speaking we have different techniques on the information technology field. Here we can note that programs (most arrows) are in the middle of different information systems. Then programs handle the data in a system (documents and/or databases). However we have to have one specific

296 program which is different – i.e. operating system. Operating systems handle connections with  
297 machinery and processors. Generally speaking programs can work with an operating system and  
298 developers of programs use different parts of an operating system.  
299

300 We have to note that data can have different models and data (models) are developed and/or used by  
301 different stakeholders (four basic functions). Especially in databases there are possibilities for  
302 several data models; depending on the modellers there can be different data models in databases.  
303 Generally speaking changing data models can be very difficult in many cases.  
304

305 In the previous consultations I have advocated following solution as the maximum solution:  
306

- 307 \* public sector institute owns the machinery and processor of the information system
- 308 \* the machinery and processor are based on relevant open standards
- 309 \* the operating system is based on an open-source solution
- 310 \* public sector institute owns the source code of the information system
- 311 \* public sector institute owns the database of the information system
- 312 \* the database is based on open-source solution and on relevant open standards
- 313 \* public sector institute owns all data in the information system.  
314

315 Naturally, there can be solutions, which are not based on the maximum solution.  
316

317 Next table gives us some possibilities for assessing possibilities for open solutions and closed  
318 solutions.  
319

320 **Note: The relations between different aspects of information systems can result rather**  
321 **complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**  
322

323 **Proposal: There could be some considerations for assessing possible / future changes in**  
324 **ownerships, agreements and memberships.**  
325

326 Here we can note the difference between owners, agreements and members. In reality ownerships  
327 agreements and memberships cause very complex networks, and those networks are changing all  
328 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other  
329 entities, life-cycles, etc.  
330

331 Here we can note that ownership, agreement and membership are interlinked in different ways.  
332 Generally speaking average usage of a system means an unique combination of ownership,  
333 agreement and membership. When everything works fine there are not problems. However changes  
334 with ownership, agreement and membership can result difficult situations.  
335

336  
337 [Continues on the next page]  
338  
339  
340

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

341

342 **General remarks / Challenges to privacy on different levels (national, European Union and**  
343 **global**

344

345 Based on previously mentioned issues there are several challenges for privacy:

346

- 347 • new identifiers (ID) in the future
- 348 • problems with different identifiers (ID)
- 349 • identifiers (ID) on different levels (national, European, global)
- 350 • problems of standardisation and standards
- 351 • possibilities for standardisation
- 352 • member state systems and member state contact points (MSCP)
- 353 • European Union contact point (EUCP)
- 354 • problems of ownership
- 355 • problems of membership
- 356 • problems of agreements.

357

358 This consultation was mostly about evaluation of one specific directive. When implementing  
359 different privacy solutions there will be several possibilities for technical solutions.

360

361 **Proposal: There could be more technically oriented consultations in the future.**

362

363 Possible technical solutions related to privacy could be assessed carefully. Possibly technical issues

364 could be implemented as European Commission decisions.

365

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

367



368

369

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

372

373

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

374

375

376

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

377

378

379

**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.**

380

381

382

383

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

384

385

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

386

387

388

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 dont need direct system-to-system communications with back-office systems.

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

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

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

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

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

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### ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the 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](http://www.jukkarannila.fi/lausunnot.html#nro_1)

EN: Opinion 2: Schools for the 21st Century  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_2](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](http://www.jukkarannila.fi/lausunnot.html#nro_3)

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_5](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](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_9)

EN: Opinion 15: Collective Redress  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_15](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_18)

EN: Opinion 19: Official Acknowledgement by the Commission  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)

- 438 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
439 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
440
- 441 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
442 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
443
- 444 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
445 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
446
- 447 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
448 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
449
- 450 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
451 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
452
- 453 EN: Opinion 30: Internet Filtering  
454 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
455 NOTE: Organised by the European Committee for Standardization (CEN) <sup>7</sup>  
456
- 457 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
458 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
459
- 460 EN: Opinion 34: REMIT Registration Format  
461 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
462 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>8</sup>  
463
- 464 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
465 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
466
- 467 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
468 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
469
- 470 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
471 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
472
- 473 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
474 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
475
- 476 EN: Opinion 41: AT.39398: observations on the proposed commitments  
477 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
478
- 479 EN: Opinion 42: Opening up Education  
480 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)

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

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

- 481  
482 EN: Opinion 43: Publication of extracts of the European register of market participants  
483 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
484 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
485  
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- 530 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
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- 538 EN: Opinion 80: Mandatory Transparency Register  
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- 549 My opinions to the previous and relevant consultations – there consultations were mostly organised  
550 by the Commission of the European Union. General page to all consultations – both in English and  
551 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>  
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- 554 [Continues on the next page]  
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9 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three "old" parties were not traditionally as the three largest parties. On 2015 this "new" party is part of the current Finnish Government. We all must be interested about this new development in Finland.