

1  
2 TO:  
3 Unit F.2  
4 Directorate-General for Communications Networks, Content and Technology  
5 European Commission  
6

7 TO:  
8 Unit E.4  
9 Commission's Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
10 European Commission  
11

12 **Digital Services Act package – ex ante regulatory instrument of very large online platforms**  
13 **acting as gatekeepers**

14 **Ref. Ares(2020)2877647 - 04/06/2020**  
15

16 A lot of thanks to Directorate-General for Communications Networks, Content and Technology  
17 **AND** Commission's Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
18 for organising this important consultation.  
19

20 This opinion represents an opinion of an individual citizen, not any legal entity.  
21

22 This opinion does not contain:

- 23 – any business secrets
  - 24 – any trade secrets
  - 25 – any confidential information.
- 26

27 This opinion is public.

28 PDF file of this opinion can be added to a relevant web page.  
29

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

31 Annex 2 holds information about copyright, licence and disclaimers.  
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34 Best Regards,  
35  
36

37 Jukka S. Rannila  
38 citizen of Finland  
39

40 signed electronically  
41  
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43 [Continues on the next page]  
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**46 About previous consultations / Repeating several issues**

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

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**52 Highlighting only some issues**

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

58

**59 Consultation document is technologically neutral and does not mentioning company names**

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61 It is fully understandable that consultation document is technologically neutral. It is also fully  
62 understandable that consultation document does not mention specific company names (very large  
63 online platforms).

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**66 Book / The Internet Trap / Mentioning specific company names**

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68 I recommend reading the book by Matthew Hindman. Matthew Hindman describes digital economy  
69 with specific company names.

70

71 **Hindman, M. (2018). The Internet Trap: How the digital economy builds monopolies  
72 and undermines democracy. Princeton, New Jersey: Princeton University Press.**

73

74 I read the Finnish version of the book.

75

76 **Hindman, M. (2019). Internet-ansa: Miten digitaalinen talous rakentaa monopoleja ja  
77 nakertaa demokratiaa (K. Pietiläinen, Trans.). Helsinki: Terra Cognita.**

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**80 Opinions about option 3 (options 3a and 3b)**

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82 Option 3a: Prohibition or restriction of certain unfair trading practices by large online  
83 platforms acting as gatekeepers ("blacklisted" practices).

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85 **Opinion: This option (3a) can be supported since there can be new unfair  
86 practices in the future.**

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88 In reality it is not possible to know all new unfair practices in the future.

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Option 3b: Adoption of tailor-made remedies addressed to large online platforms acting as gatekeepers on a case-by-case basis where necessary and justified.

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**Opinion: This option (3b) can be supported since there can be new unfair practices especially related to some specific large online platforms.**

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In reality it is not possible to know all new unfair practices in the future and there can be problems with some specific large online platforms.

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**Good luck!!!**

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

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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](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)

- 156 EN: Opinion 19: Official Acknowledgement by the Commission  
157 [http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)  
158
- 159 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
160 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
161
- 162 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
163 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
164
- 165 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
166 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
167
- 168 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
169 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
170
- 171 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
172 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
173
- 174 EN: Opinion 30: Internet Filtering  
175 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
176 NOTE: Organised by the European Committee for Standardization (CEN) <sup>1</sup>  
177
- 178 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
179 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
180
- 181 EN: Opinion 34: REMIT Registration Format  
182 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
183 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>2</sup>  
184
- 185 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
186 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
187
- 188 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
189 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
190
- 191 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
192 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
193
- 194 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
195 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
196
- 197 EN: Opinion 41: AT.39398: observations on the proposed commitments  
198 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)

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

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

- 199  
200 EN: Opinion 42: Opening up Education  
201 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)  
202  
203 EN: Opinion 43: Publication of extracts of the European register of market participants  
204 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
205 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
206  
207 EN: Opinion 44: Evaluation policy guidelines  
208 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
209  
210 EN: Opinion 45: About ICT standardisation  
211 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
212  
213 EN: Opinion 46: Review of the EU copyright rules  
214 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
215  
216 EN: Opinion 51: European Area of Skills and Qualifications  
217 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
218  
219 EN: Opinion 52: Trusted Cloud Europe Survey  
220 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
221  
222 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
223 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
224 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
225  
226 EN: Opinion 55: European Energy Regulation  
227 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
228 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
229  
230 EN: Opinion 59: Green paper on mobile Health  
231 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
232  
233 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
234 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
235  
236 EN: Opinion 61: European Register of Products Containing Nanomaterials  
237 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
238  
239 EN: Opinion 64: Corporate Social Responsibility - European Commission  
240 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
241  
242 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
243 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)

- 244 EN: Opinion 68: European Network Code Stakeholder Committees  
245 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
246 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
247  
248 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
249 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
250 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
251  
252 EN: Opinion 74: Enabling the Internet of Things  
253 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
254 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) <sup>3</sup>  
255  
256 EN: Opinion 80: Mandatory Transparency Register  
257 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
258  
259 EN: Opinion 84: Revision of the European Interoperability Framework  
260 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
261  
262 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
263 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
264  
265 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
266 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
267  
268 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
269 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
270 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
271  
272 EN: Opinion 93: Safety of apps and other non-embedded software  
273 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
274  
275 EN: Opinion 95: Targeted consultation on eForms  
276 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
277  
278 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)  
279 [http://www.jukkarannila.fi/lausunnot.html#nro\\_97](http://www.jukkarannila.fi/lausunnot.html#nro_97)  
280  
281 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals  
282 [http://www.jukkarannila.fi/lausunnot.html#nro\\_98](http://www.jukkarannila.fi/lausunnot.html#nro_98)  
283  
284 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy  
285 Regulators. Recast  
286 [http://www.jukkarannila.fi/lausunnot.html#nro\\_99](http://www.jukkarannila.fi/lausunnot.html#nro_99)  
287

<sup>3</sup> <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 288 EN: Opinion 100: Protection of personal data (EU)  
289 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)  
290
- 291 EN: Opinion 101: Governance of the Energy Union  
292 [http://www.jukkarannila.fi/lausunnot.html#nro\\_101](http://www.jukkarannila.fi/lausunnot.html#nro_101)  
293
- 294 EN: Opinion 102: Smart Wearables  
295 [http://www.jukkarannila.fi/lausunnot.html#nro\\_102](http://www.jukkarannila.fi/lausunnot.html#nro_102)  
296
- 297 EN: Opinion 106: Review of the European Union Agency for Network and Information Security  
298 (ENISA)  
299 [http://www.jukkarannila.fi/lausunnot.html#nro\\_106](http://www.jukkarannila.fi/lausunnot.html#nro_106)  
300
- 301 EN: Opinion 108: Single Digital Gateway  
302 [http://www.jukkarannila.fi/lausunnot.html#nro\\_108](http://www.jukkarannila.fi/lausunnot.html#nro_108)  
303
- 304 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code  
305 [http://www.jukkarannila.fi/lausunnot.html#nro\\_110](http://www.jukkarannila.fi/lausunnot.html#nro_110)  
306
- 307 EN: Opinion 111: Interoperability of information systems for migration and security  
308 [http://www.jukkarannila.fi/lausunnot.html#nro\\_111](http://www.jukkarannila.fi/lausunnot.html#nro_111)  
309
- 310 EN: Opinion 113: Transform of health and care  
311 [http://www.jukkarannila.fi/lausunnot.html#nro\\_113](http://www.jukkarannila.fi/lausunnot.html#nro_113)  
312
- 313 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the  
314 Internet  
315 [http://www.jukkarannila.fi/lausunnot.html#nro\\_114](http://www.jukkarannila.fi/lausunnot.html#nro_114)  
316 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
317
- 318 EN: Opinion 118: Fake news and online disinformation  
319 [http://www.jukkarannila.fi/lausunnot.html#nro\\_118](http://www.jukkarannila.fi/lausunnot.html#nro_118)  
320
- 321 EN: Opinion 119: European Social Security Number  
322 [http://www.jukkarannila.fi/lausunnot.html#nro\\_119](http://www.jukkarannila.fi/lausunnot.html#nro_119)  
323
- 324 EN: Opinion 120: European Labour Authority  
325 [http://www.jukkarannila.fi/lausunnot.html#nro\\_120](http://www.jukkarannila.fi/lausunnot.html#nro_120)  
326
- 327 EN: Opinion 121: 2nd Data Package  
328 [http://www.jukkarannila.fi/lausunnot.html#nro\\_121](http://www.jukkarannila.fi/lausunnot.html#nro_121)  
329
- 330 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European  
331 Cybersecurity Research and Competence Centre  
332 [http://www.jukkarannila.fi/lausunnot.html#nro\\_122](http://www.jukkarannila.fi/lausunnot.html#nro_122)



333

334 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF  
335 THE COUNCIL on the re-use of public sector information (recast)

336 [http://www.jukkarannila.fi/lausunnot.html#nro\\_123](http://www.jukkarannila.fi/lausunnot.html#nro_123)

337

338 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents

339 [http://www.jukkarannila.fi/lausunnot.html#nro\\_125](http://www.jukkarannila.fi/lausunnot.html#nro_125)

340

341 EN: Opinion 128: Summertime arrangements

342 [http://www.jukkarannila.fi/lausunnot.html#nro\\_128](http://www.jukkarannila.fi/lausunnot.html#nro_128)

343

344 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange

345 [http://www.jukkarannila.fi/lausunnot.html#nro\\_129](http://www.jukkarannila.fi/lausunnot.html#nro_129)

346

347 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data

348 [http://www.jukkarannila.fi/lausunnot.html#nro\\_132](http://www.jukkarannila.fi/lausunnot.html#nro_132)

349

350 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement  
351 ("eForms")

352 [http://www.jukkarannila.fi/lausunnot.html#nro\\_133](http://www.jukkarannila.fi/lausunnot.html#nro_133)

353

354 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by  
355 UCC

356 [http://www.jukkarannila.fi/lausunnot.html#nro\\_134](http://www.jukkarannila.fi/lausunnot.html#nro_134)

357

358 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)

359 [http://www.jukkarannila.fi/lausunnot.html#nro\\_139](http://www.jukkarannila.fi/lausunnot.html#nro_139)

360

361 EN: Opinion 141: Farm Accountancy Data Network

362 [http://www.jukkarannila.fi/lausunnot.html#nro\\_141](http://www.jukkarannila.fi/lausunnot.html#nro_141)

363

364 EN: Opinion 142: Horizon Europe (two consultations)

365 [http://www.jukkarannila.fi/lausunnot.html#nro\\_142](http://www.jukkarannila.fi/lausunnot.html#nro_142)

366

367 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation  
368 (evaluation)

369 [http://www.jukkarannila.fi/lausunnot.html#nro\\_144](http://www.jukkarannila.fi/lausunnot.html#nro_144)

370

371 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative

372 [http://www.jukkarannila.fi/lausunnot.html#nro\\_146](http://www.jukkarannila.fi/lausunnot.html#nro_146)

373 NOTE: Organised by the European Committee for Standardization (CEN)

374

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

376 [http://www.jukkarannila.fi/lausunnot.html#nro\\_147](http://www.jukkarannila.fi/lausunnot.html#nro_147)

377

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

379 [http://www.jukkarannila.fi/lausunnot.html#nro\\_152](http://www.jukkarannila.fi/lausunnot.html#nro_152)

380

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

382 [http://www.jukkarannila.fi/lausunnot.html#nro\\_154](http://www.jukkarannila.fi/lausunnot.html#nro_154)

383

384 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year  
385 2021

386 [http://www.jukkarannila.fi/lausunnot.html#nro\\_156](http://www.jukkarannila.fi/lausunnot.html#nro_156)

387

388 EN: Opinion 159: EU competition law - market definition notice (evaluation)

389 [http://www.jukkarannila.fi/lausunnot.html#nro\\_159](http://www.jukkarannila.fi/lausunnot.html#nro_159)

390

391 EN: Opinion 161: New Competition Tool ('NCT')

392 [http://www.jukkarannila.fi/lausunnot.html#nro\\_161](http://www.jukkarannila.fi/lausunnot.html#nro_161)

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396 My opinions to the previous and relevant consultations – there consultations were mostly organised  
397 by the European Commission. General page to all consultations – both in English and in Finnish:

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

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402 [Continues on the next page]

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**ANNEX 2**

405 DISCLAIMERS

406

407 Legal disclaimer:

408 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am  
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