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TO: European Commission

Based on SWD(2017) 211 final (Brussels, 2.5.2017) contact point for this consultation is following unit:

**European Commission, Directorate General Internal Market, Industry,
Entrepreneurship and SME
Directorate E, Modernisation of the Single Market
Unit E3, Digitalisation of the Single Market**

First of all, a lot of thanks to the 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 on the European Union level.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

40

41 **A list of previous consultations**

42

43 On Annex 1 is information about my previous consultations based on different consultations. Many
44 opinions have been addressed to different units of the European Commission. I have repeated the
45 same issues several times on those documents (Opinions).

46

47 **Number of pages based on this consultations / Rather limited opinion**

48

49 I calculated number of pages based on different documents.

50

51	COM(2017) 256 final	70 pages
52	COM(2017) 256 final → ANNEXES 1 to 3	7 pages
53	SWD(2017) 213 final → PART 1/3	76 pages
54	SWD(2017) 213 final → PART 2/3	126 pages
55	SWD(2017) 213 final → PART 3/3	73 pages
56	SWD(2017) 214 final	3 pages
57	SEC(2017)202 → Part 1	2 pages
58	SEC(2017)202 → Part 2	3 pages
59	SWD(2017) 211 final	6 pages
60	SWD(2017) 212 final	8 pages
61		<u>374 pages</u>

62

63 I have not read all those pages (374). Therefore this opinion is rather limited.

64

65 **Highlighting just some issues based on information technology issues**

66

67 SWD(2017) 213 final (part 2/3) contains information about (ANNEX 10) visual overview of links
68 with other initiatives.

69

70 **About links between different information systems**

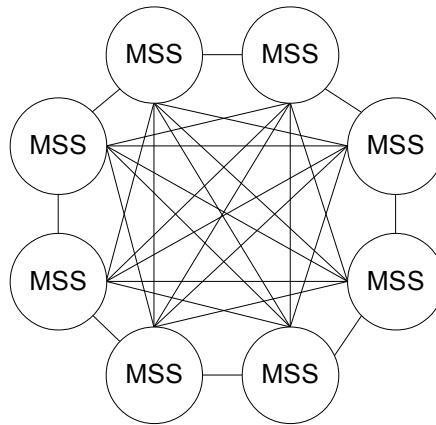
71

72 Different member states (European Union) have unique situations with information systems. Next
73 figure tries to describe this situation with member state systems (MSS).

74

75 [Continues on the next page]

1



MSS = Member State System

76
77
78

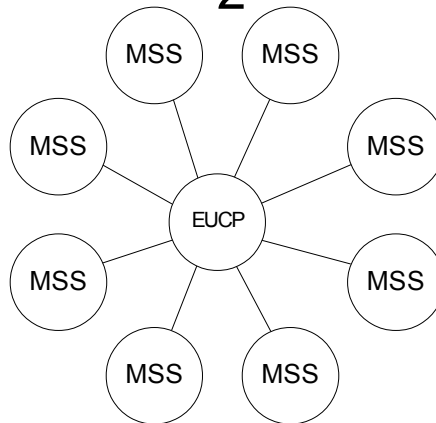
79 Based on unique situations there can be several complicated system-to-system connections in
80 different member states.

81

82 One option could be linking different member state systems to one European Union Contact Point.

83

2



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

84

85

86

87 This option (MSS ↔ EUCP) could mean very large number of different member state system.

88

89

90

28 x 10 = 280 MSS ↔ 1 EUCP

91

28 x 20 = 560 MSS ↔ 1 EUCP

92

28 x 30 = 840 MSS ↔ 1 EUCP

93

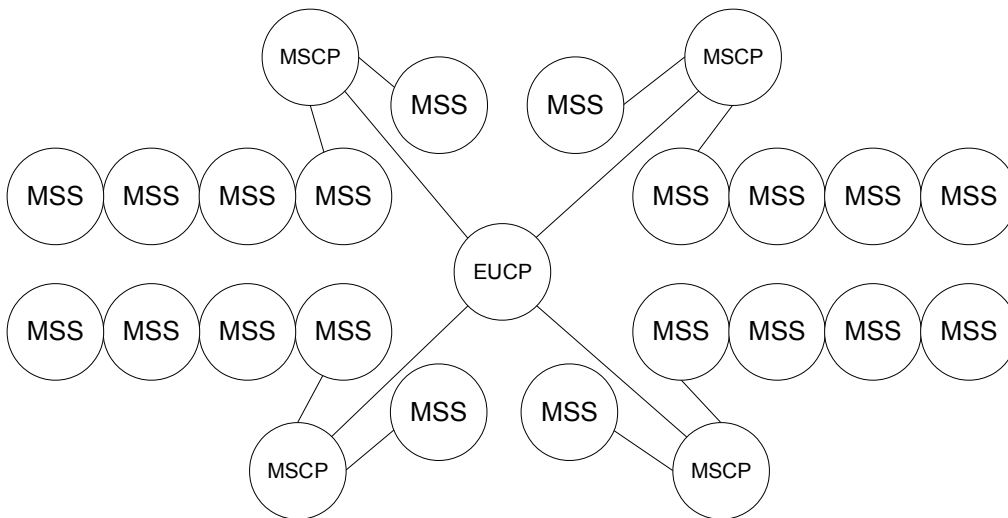
etc.

94

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

100
 101 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 102 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
 103

3



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

104
 105
 106
 107
 108 **Proposal: There could be some serious work for developing a standardised member**
 109 **state contact point (MSCP).**

110
 111 **Proposal: After developing a standardised member state contact point (MSCP)**
 112 **different member states could consolidate their systems (MSS ↔ MSCP).**

113
 114 **Proposal: European Union contact point (EUCP) and member state contact points**
 115 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European**
 116 **Union level.**

117
 118 Naturally we have to note that developing a standardised member state contact point (MSCP) means
 119 more work. On the other hand a standardised member state contact point (MSCP) could handle
 120 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
 121 states may have more systems than other member states. We have to note that there are different
 122 systems based on several technological solutions.

123

124

125 **About different standards to be used when developing standardised member state contacts**
126 **points (MSCP)**

127

128 Developing a *standardised* member state contact point (MSCP) means some work to be done.

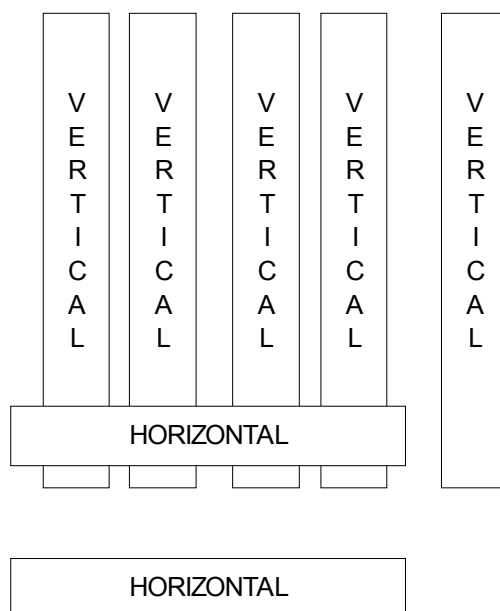
129

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

132

133 **Favouring open standards / Favouring horizontal standards**

134



135

136

137 There are differences between horizontal and vertical standards. A simple example is naturally
138 email solutions. There are several vertical standards when creating technically email solutions. Then
139 there are horizontal standards which enable sending messages between technically different email
140 solutions.

141

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

143

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

146

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

149

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

151

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

153

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

156

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

159

160 Here we can note some problems:

161

- 162 • some systems are based on **de-facto** standards
- 163 • some systems are based on **de-jure** standards
- 164 • there can be confrontations between **de-facto** and **de-jure** standards
- 165 • there can be a monopoly situation in some domain
- 166 • some standards may inhibit possible actions of some stakeholders
- 167 • there can be a standard war on some domains
- 168 • standards have different life-cycles
- 169 • systems have different life-cycles
- 170 • there can be mismatches between different life-cycles
- 171 • there can be failed standards
- 172 • there can be deprecated standards.

173

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

178

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

185

186 **About different identifiers (ID)**

187

188 Developing a standardised member state contact point (MSCP) means some work to be done. Here
189 we can note that there will be several *identifiers* when developing new systems and maintaining
190 current systems (EUCP ↔ MSCP).

191

192 I have proposed several times to use *open and public identifiers* when developing different
193 information system.

194

195 **More and more new identifiers (ID)**

196

197 In previous consultations there has been discussion about different identifiers (ID) in different
198 information systems. It can be noted from the previous opinions that there will be several and
199 different identifiers (ID) for different levels.

200

201 Examples of these identifiers (ID) are following:

202

203 1) Facebook ID for an individual person

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

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

206 4) Reuters instruments codes (RICs)

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

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

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

210

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

214

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

217

218 **Proposal: Possible systematic review of different identifiers (ID) should assess different**
219 **situations.**

220

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

224

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

227

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

231

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

233

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

237

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

239

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

241

242 In the European Union there has been different anti-trust cases which are related to different private
243 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
244 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.
245

246 **An example for cooperation: Web feeds (RSS and Atom)**
247



248
249
250 I have advocated usage of web feeds on several previous opinion documents.
251

252 **Proposal: Web feeds could be advocated when developing different informations**
253 **systems.**
254

255 **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
256 **time) information for different stakeholder(s) (communities).**
257

258 **Proposal: There can be different web feeds (RSS and/or Atom) for different**
259 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
260 **solution.**
261

262 **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
263

264 Actually there are two standards for web feeds: RSS ^{1 2} and ^{3 4 5} Atom.
265

266 It can be easier to create web feeds in different information systems since web feeds enable
267 connections without direct system-to-system connections.
268

269 It can be noted, that different back-office systems (with a wide variety of different technologies) can
270 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
271 kind solutions front-office systems don't need direct system-to-system communications with back-
272 office systems.
273

274 **Good luck!!!**
275

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

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

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

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

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

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

278

ANNEX 1

279

280 My opinions to the previous and relevant consultations – there consultations were mostly organised
281 by the European Commission. General page to all consultations – both in English and in Finnish:
282 <http://www.jukkarannila.fi/lausunnot.html>

283

284

285 My opinions to the previous and relevant consultations – there consultations were mostly organised
286 by the European Commission.

287

288 EN: Opinion 1: Review of the rules on access to documents

289 http://www.jukkarannila.fi/lausunnot.html#nro_1

290

291 EN: Opinion 2: Schools for the 21st Century

292 http://www.jukkarannila.fi/lausunnot.html#nro_2

293

294 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
295 Safe and Innovative medicines

296 http://www.jukkarannila.fi/lausunnot.html#nro_3

297

298 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

299 http://www.jukkarannila.fi/lausunnot.html#nro_5

300

301 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

302 http://www.jukkarannila.fi/lausunnot.html#nro_6

303

304 EN: Opinion 8: European Interoperability Framework, version 2, draft

305 http://www.jukkarannila.fi/lausunnot.html#nro_8

306

307 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
308 proposal for comments

309 http://www.jukkarannila.fi/lausunnot.html#nro_9

310

311 EN: Opinion 15: Collective Redress

312 http://www.jukkarannila.fi/lausunnot.html#nro_15

313

314 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

315 http://www.jukkarannila.fi/lausunnot.html#nro_17

316

317 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

318 http://www.jukkarannila.fi/lausunnot.html#nro_18

319

320 EN: Opinion 19: Official Acknowledgement by the Commission

321 http://www.jukkarannila.fi/lausunnot.html#nro_19

322

- 323 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
324 http://www.jukkarannila.fi/lausunnot.html#nro_20
325
- 326 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
327 http://www.jukkarannila.fi/lausunnot.html#nro_21
328
- 329 EN: Opinion 23: Public consultation on the review of the European Standardisation System
330 http://www.jukkarannila.fi/lausunnot.html#nro_23
331
- 332 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
333 http://www.jukkarannila.fi/lausunnot.html#nro_27
334
- 335 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
336 http://www.jukkarannila.fi/lausunnot.html#nro_28
337
- 338 EN: Opinion 30: Internet Filtering
339 http://www.jukkarannila.fi/lausunnot.html#nro_30
340 NOTE: Organised by the European Committee for Standardization (CEN) ⁶
341
- 342 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
343 http://www.jukkarannila.fi/lausunnot.html#nro_32
344
- 345 EN: Opinion 34: REMIT Registration Format
346 http://www.jukkarannila.fi/lausunnot.html#nro_34
347 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁷
348
- 349 EN: Opinion 35: Exploiting the employment potential of the personal and household services
350 http://www.jukkarannila.fi/lausunnot.html#nro_35
351
- 352 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
353 http://www.jukkarannila.fi/lausunnot.html#nro_37
354
- 355 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
356 http://www.jukkarannila.fi/lausunnot.html#nro_39
357
- 358 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
359 http://www.jukkarannila.fi/lausunnot.html#nro_40
360
- 361 EN: Opinion 41: AT.39398: observations on the proposed commitments
362 http://www.jukkarannila.fi/lausunnot.html#nro_41
363
- 364 EN: Opinion 42: Opening up Education
365 http://www.jukkarannila.fi/lausunnot.html#nro_42

⁶ <http://www.cen.eu/> (Accessed 2 July 2012)

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

- 366
367 EN: Opinion 43: Publication of extracts of the European register of market participants
368 http://www.jukkarannila.fi/lausunnot.html#nro_43
369 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
370
371 EN: Opinion 44: Evaluation policy guidelines
372 http://www.jukkarannila.fi/lausunnot.html#nro_44
373
374 EN: Opinion 45: About ICT standardisation
375 http://www.jukkarannila.fi/lausunnot.html#nro_45
376
377 EN: Opinion 46: Review of the EU copyright rules
378 http://www.jukkarannila.fi/lausunnot.html#nro_46
379
380 EN: Opinion 51: European Area of Skills and Qualifications
381 http://www.jukkarannila.fi/lausunnot.html#nro_51
382
383 EN: Opinion 52: Trusted Cloud Europe Survey
384 http://www.jukkarannila.fi/lausunnot.html#nro_52
385
386 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
387 http://www.jukkarannila.fi/lausunnot.html#nro_53
388 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
389
390 EN: Opinion 55: European Energy Regulation
391 http://www.jukkarannila.fi/lausunnot.html#nro_55
392 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
393
394 EN: Opinion 59: Green paper on mobile Health
395 http://www.jukkarannila.fi/lausunnot.html#nro_59
396
397 EN: Opinion 60: Cross-border inheritance tax problems within the EU
398 http://www.jukkarannila.fi/lausunnot.html#nro_60
399
400 EN: Opinion 61: European Register of Products Containing Nanomaterials
401 http://www.jukkarannila.fi/lausunnot.html#nro_61
402
403 EN: Opinion 64: Corporate Social Responsibility - European Commission
404 http://www.jukkarannila.fi/lausunnot.html#nro_64
405
406 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
407 http://www.jukkarannila.fi/lausunnot.html#nro_66
408
409
410

- 411 EN: Opinion 68: European Network Code Stakeholder Committees
412 http://www.jukkarannila.fi/lausunnot.html#nro_68
413 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
414
415 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
416 http://www.jukkarannila.fi/lausunnot.html#nro_71
417 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
418
419 EN: Opinion 74: Enabling the Internet of Things
420 http://www.jukkarannila.fi/lausunnot.html#nro_74
421 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁸
422
423 EN: Opinion 80: Mandatory Transparency Register
424 http://www.jukkarannila.fi/lausunnot.html#nro_80
425
426 EN: Opinion 84: Revision of the European Interoperability Framework
427 http://www.jukkarannila.fi/lausunnot.html#nro_84
428
429 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
430 http://www.jukkarannila.fi/lausunnot.html#nro_86
431
432 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
433 http://www.jukkarannila.fi/lausunnot.html#nro_88
434
435 EN: Opinion 89: BEREC Guidelines for net neutrality rules
436 http://www.jukkarannila.fi/lausunnot.html#nro_89
437 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
438
439 EN: Opinion 93: Safety of apps and other non-embedded software
440 http://www.jukkarannila.fi/lausunnot.html#nro_93
441
442 EN: Opinion 95: Targeted consultation on eForms
443 http://www.jukkarannila.fi/lausunnot.html#nro_95
444
445 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
446 http://www.jukkarannila.fi/lausunnot.html#nro_97
447
448 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
449 http://www.jukkarannila.fi/lausunnot.html#nro_98
450
451 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
452 Regulators. Recast
453 http://www.jukkarannila.fi/lausunnot.html#nro_99
454

⁸ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

455

456 EN: Opinion 100: Protection of personal data (EU)

457 http://www.jukkarannila.fi/lausunnot.html#nro_100

458

459 EN: Opinion 101: Governance of the Energy Union

460 http://www.jukkarannila.fi/lausunnot.html#nro_101

461

462 EN: Opinion 102: Smart Wearables

463 http://www.jukkarannila.fi/lausunnot.html#nro_102

464

465 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
466 (ENISA)467 http://www.jukkarannila.fi/lausunnot.html#nro_106

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490

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518

519

520



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.