TO: European Commission

First reference: COM(2016) 863 final


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 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]
Previous opinions addressed to the Agency for the Cooperation of Energy Regulators (ACER)

ACER has organised several consultations and I have given following opinions to ACER:

- EN: Opinion 34: REMIT Registration Format
  [http://www.jukkarannila.fi/lausunnot.html#nro_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)

- EN: Opinion 43: Publication of extracts of the European register of market participants
  [http://www.jukkarannila.fi/lausunnot.html#nro_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)

- EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
  [http://www.jukkarannila.fi/lausunnot.html#nro_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)

- EN: Opinion 55: European Energy Regulation
  [http://www.jukkarannila.fi/lausunnot.html#nro_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)

- EN: Opinion 68: European Network Code Stakeholder Committees
  [http://www.jukkarannila.fi/lausunnot.html#nro_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)

  [http://www.jukkarannila.fi/lausunnot.html#nro_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)

Opinions – interested European Union citizen

I have given those previous six (6) opinions as an interested European Union citizen (in Finland). Those six (6) opinions are not opinions of some legal entity.

Public ACER consultations

ACER consultations have been very interesting. Here we can note ACER has at least tried public consultations based on different issues. I propose some issues to be added to the proposed/revised regulation.

Amount of material for this consultation – 2007/0197(COD) – COM(2016) 863 final

I collected all material (COM document and several SWD documents) based on this consultation.

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Material for this consultation is very extensive and I have not read all material.

Some humble notices based on COM(2016) 863 final

Based on previous experiences with ACER consultations I have only some humble proposals for the “Consultations and transparency” article – COM(2016) 863 final.

Article 15

Consultations and transparency (on pages 44-45 – COM(2016) 863 final.)

(new recital 5)

5. The Agency shall keep public information about the register of interested stakeholders on its website. The Agency shall collect contact information to the register based on requests of interested stakeholders.

(new recital 6)

6. The Agency shall keep an up-to-date register of stakeholders who are interested for giving opinions based on the Agency’s proposals. The Agency shall inform registered stakeholders based on different Agency’s proposals. The Agency shall give a reasonable timetable for different consultations based on different Agency’s proposals.

(new recital 7)

7. The Agency shall publish results of public consultations on the Agency’s website.

Reasonable timetable for public consultations?

On the other hand there could be some time limits for different public consultations – e.g. two months.

Good luck!!!

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

[Continues on the next page]
ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the Europan 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

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

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

EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

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EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_20

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
http://www.jukkarannila.fi/lausunnot.html#nro_21

EN: Opinion 23: Public consultation on the review of the European Standardisation System
http://www.jukkarannila.fi/lausunnot.html#nro_23

EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
http://www.jukkarannila.fi/lausunnot.html#nro_27

EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
http://www.jukkarannila.fi/lausunnot.html#nro_28

EN: Opinion 30: Internet Filtering
http://www.jukkarannila.fi/lausunnot.html#nro_30

NOTE: Organised by the European Committee for Standardization (CEN) ¹

http://www.jukkarannila.fi/lausunnot.html#nro_32

EN: Opinion 34: REMIT Registration Format
http://www.jukkarannila.fi/lausunnot.html#nro_34

NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²

EN: Opinion 35: Exploiting the employment potential of the personal and household services
http://www.jukkarannila.fi/lausunnot.html#nro_35

EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
http://www.jukkarannila.fi/lausunnot.html#nro_37

EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
http://www.jukkarannila.fi/lausunnot.html#nro_39

EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
http://www.jukkarannila.fi/lausunnot.html#nro_40

EN: Opinion 41: AT.39398: observations on the proposed commitments
http://www.jukkarannila.fi/lausunnot.html#nro_41

EN: Opinion 42: Opening up Education
http://www.jukkarannila.fi/lausunnot.html#nro_42


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EN: Opinion 43: Publication of extracts of the European register of market participants
http://www.jukkarannila.fi/lausunnot.html#nro_43
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 44: Evaluation policy guidelines
http://www.jukkarannila.fi/lausunnot.html#nro_44

EN: Opinion 45: About ICT standardisation
http://www.jukkarannila.fi/lausunnot.html#nro_45

EN: Opinion 46: Review of the EU copyright rules
http://www.jukkarannila.fi/lausunnot.html#nro_46

EN: Opinion 51: European Area of Skills and Qualifications
http://www.jukkarannila.fi/lausunnot.html#nro_51

EN: Opinion 52: Trusted Cloud Europe Survey
http://www.jukkarannila.fi/lausunnot.html#nro_52

EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
http://www.jukkarannila.fi/lausunnot.html#nro_53
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 55: European Energy Regulation
http://www.jukkarannila.fi/lausunnot.html#nro_55
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 59: Green paper on mobile Health
http://www.jukkarannila.fi/lausunnot.html#nro_59

EN: Opinion 60: Cross-border inheritance tax problems within the EU
http://www.jukkarannila.fi/lausunnot.html#nro_60

EN: Opinion 61: European Register of Products Containing Nanomaterials
http://www.jukkarannila.fi/lausunnot.html#nro_61

EN: Opinion 64: Corporate Social Responsibility - European Commission
http://www.jukkarannila.fi/lausunnot.html#nro_64

http://www.jukkarannila.fi/lausunnot.html#nro_66

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EN: Opinion 68: European Network Code Stakeholder Committees
http://www.jukkarannila.fi/lausunnot.html#nro_68
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 71: Common Schema for the Disclosure of Inside Information
http://www.jukkarannila.fi/lausunnot.html#nro_71
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 74: Enabling the Internet of Things
http://www.jukkarannila.fi/lausunnot.html#nro_74
NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 80: Mandatory Transparency Register
http://www.jukkarannila.fi/lausunnot.html#nro_80

EN: Opinion 84: Revision of the European Interoperability Framework
http://www.jukkarannila.fi/lausunnot.html#nro_84

EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
http://www.jukkarannila.fi/lausunnot.html#nro_86

EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
http://www.jukkarannila.fi/lausunnot.html#nro_88

EN: Opinion 89: BEREC Guidelines for net neutrality rules
http://www.jukkarannila.fi/lausunnot.html#nro_89
NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

EN: Opinion 93: Safety of apps and other non-embedded software
http://www.jukkarannila.fi/lausunnot.html#nro_93

EN: Opinion 95: Targeted consultation on eForms
http://www.jukkarannila.fi/lausunnot.html#nro_95

http://www.jukkarannila.fi/lausunnot.html#nro_97

EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
http://www.jukkarannila.fi/lausunnot.html#nro_98

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

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ANNEX 2

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The English explanation is on the following web page:

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

3 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.

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