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2 TO: [policy@finance.nsw.gov.au](mailto:policy@finance.nsw.gov.au)

3 Consumer Complaints Register

4 Policy and Legislation

5 NSW Fair Trading

6 PO Box 972

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9

10 **Opinion related to the Consumer Complaints Register (Discussion Paper – October 2015)**

11

12

13 First of all, a lot of thanks to NSW Fair Trading 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 Annex 1 holds information about previous relevant consultations.

25 Annex 2 holds information about disclaimers and copyright.

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29 Best Regards,

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33 Jukka S. Rannila

34 citizen of Finland

35

36 signed electronically

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38 [Continues on the next page]

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### **Question 16: the NEW Register?**

Here we can note something from the question 16:

#### **16. What other supporting information should accompany the *NEW Register* to explain it to the public?**

It is possible that NSW Fair Trading has not yet organised procurement for the new Register. Based on the results of earlier opinions there can be several issues raised for creating a new Register.

**Note: On the annex 1 is a list of previous consultations.**

**Note: Especially on European Union level ACER (Agency for the Cooperation of Energy Regulators) has organised several consultations for assessing different issues for (new) ACER information systems.**

#### **This consultation assess different issues for creating a (possible) NEW Register**

It can be noted that every information system development project can mean a lot of problems when everything is not going according the plan.

This opinion tries to raise some issues for establishing development project for a new Register.

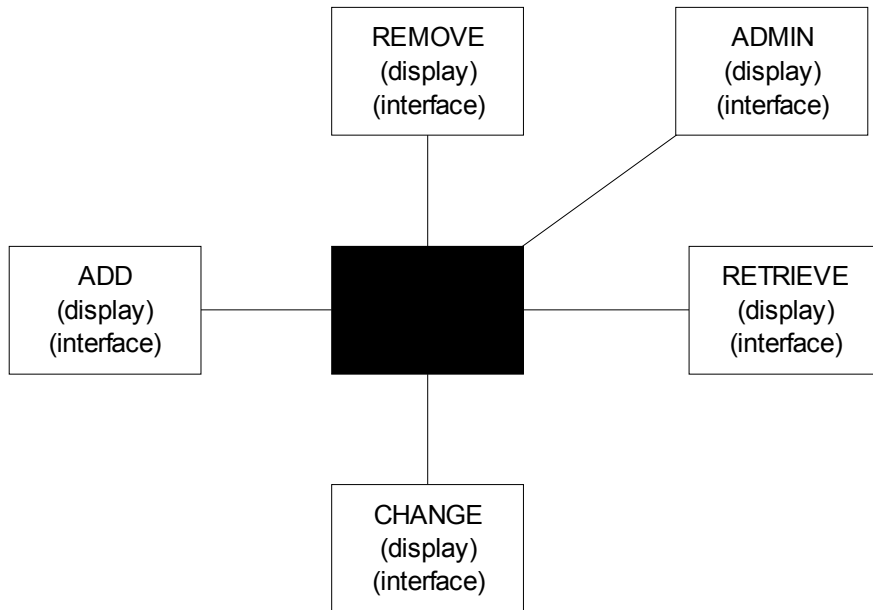
#### **Some contributions from the previous consultations?**

One of the main contributions from the previous consultations has been simplified descriptions of information technology. In many consultation documents, there has been quite ambiguous descriptions about information technology in different application fields.

#### **First conception of information technology / Black BOX**

In practical reality, we are quite ignorant about the implementation details of different information systems. Therefore, we can just use the “black box” without understanding the internal workings of an information system.

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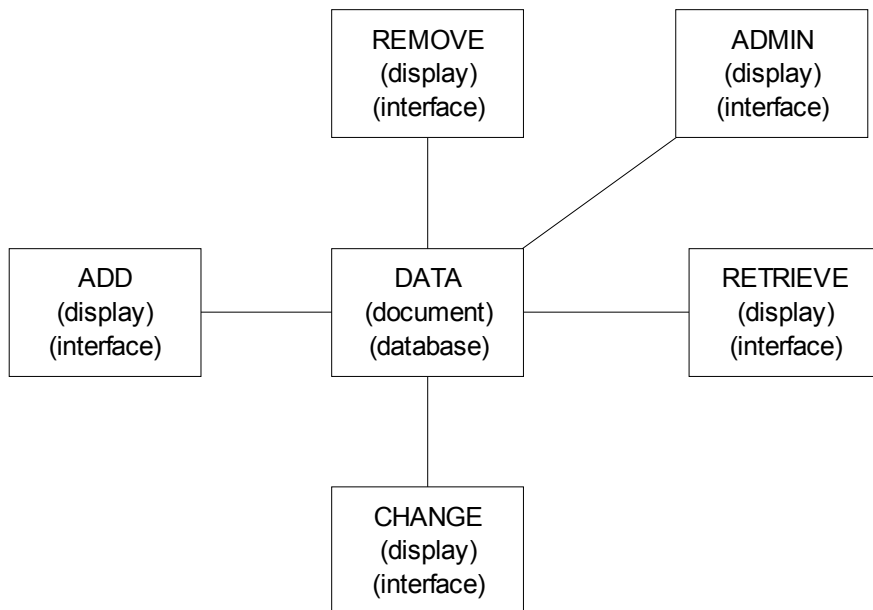


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**Second conception of information technology / White BOX**

Here we conclude two main issues about the data in different systems; data can be in documents and data can be in databases.

IF we have a direct access to the documents and/or the databases in a system we can note that it is a “white box” situation.



88  
89

90 **Third conception of information technology (IT)**

91  
 92 We have the four basic functions: add, retrieve, change and remove. Then there are databases and  
 93 documents used in different systems. Users use different displays (interfaces). Different systems  
 94 need administration (also maintenance) for keeping a system functional. Then there is  
 95 communication (also standards) for direct and indirect usage of an information system.

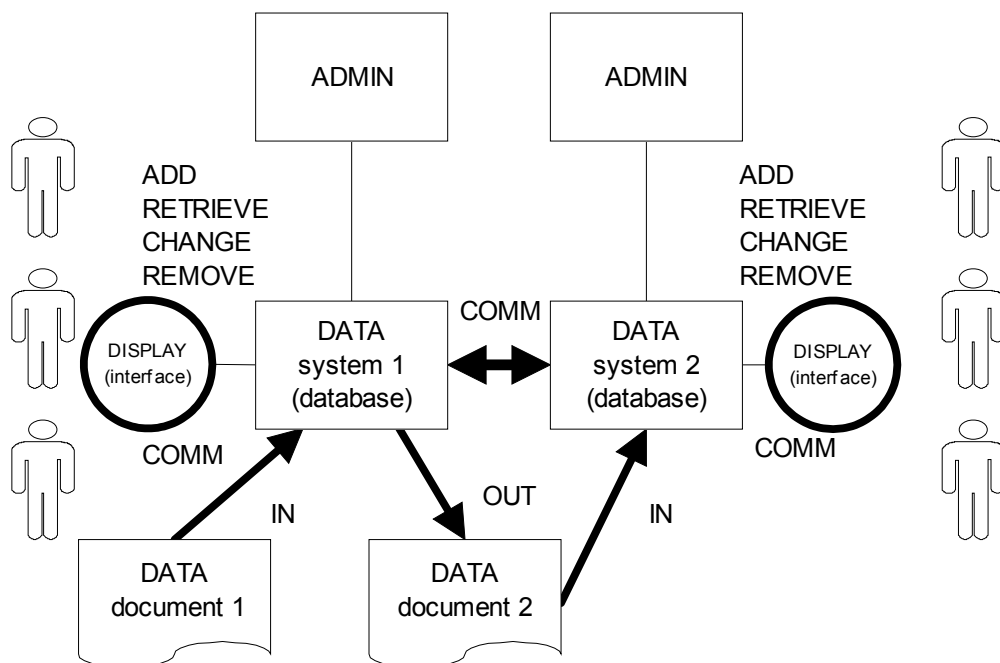
96  
 97 In practical reality, different information systems are interrelated, and practical added value is based  
 98 on the seamless cooperation between systems.

99  
 100 Here we can note some general issues with information systems. Generally speaking there can be  
 101 direct system-to-system connections. Generally speaking cooperation between systems are based on  
 102 transmitting different documents to different systems.

103  
 104 **Note: There may be a need for both solutions – direct system-to-system connections  
 105 and transmitting different documents between systems.**

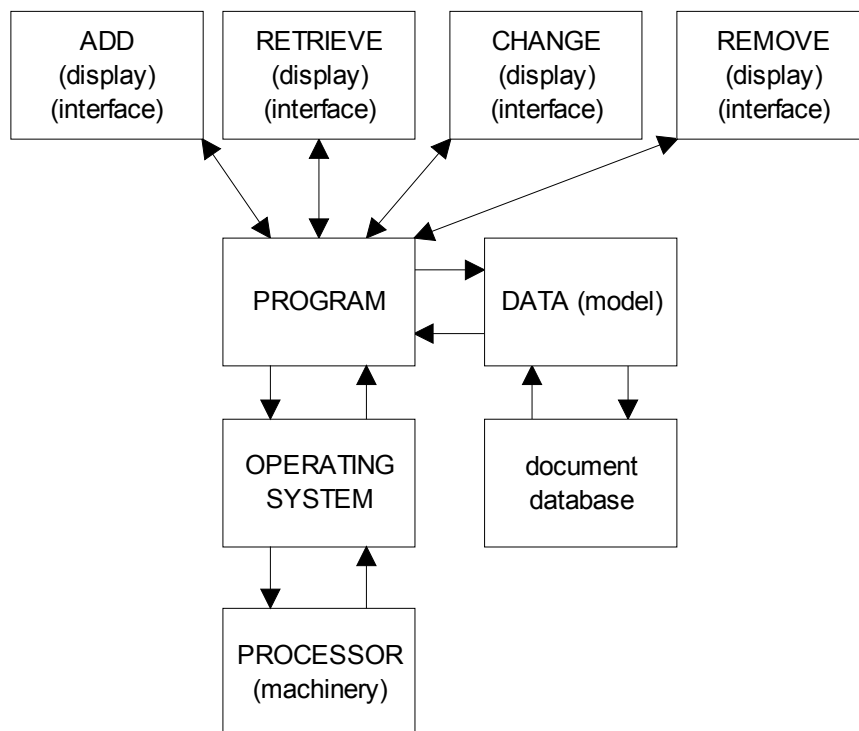
106  
 107 **Proposal: Probably there has to both options implemented – direct system-to-system  
 108 connections and transmitting different documents between systems.**

109  
 110 **Proposal: There could be a need for technically oriented consultation(s) based on the  
 111 results of this consultation.**



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**Fourth conception of information technology**



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119 Generally speaking we have different techniques on the information technology field. Here we can  
120 note that programs (most arrows) are in the middle of different information systems. Then programs  
121 handle the data in a system (documents and/or databases). However we have to have one specific  
122 program which is different – i.e. operating system. Operating systems handle connections with  
123 machinery and processors. Generally speaking programs can work with an operating system and  
124 developers of programs use different parts of an operating system.

125

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

130

131 **Owner, member or agreement?**

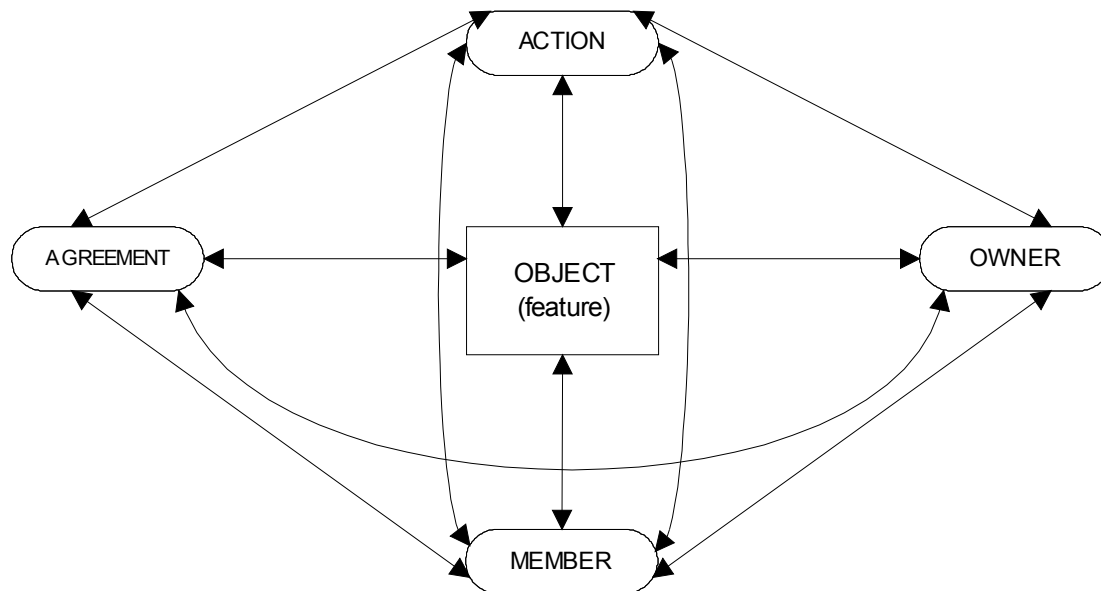
132

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

137

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

142



143

144

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

147

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

149

150 \* public sector institute owns the machinery and processor of the information system

151 \* the machinery and processor are based on relevant open standards

152 \* the operating system is based on an open-source solution

153 \* public sector institute owns the source code of the information system

154 \* public sector institute owns the database of the information system

155 \* the database is based on open-source solution and on relevant open standards

156 \* public sector institute owns all data in the information system.

157

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

159

160 **Proposal: NSW Fair Trading could organise more legally oriented consultation(s)**  
 161 **about the possible consumer complaints register.**

162

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

165

166 Next table gives us some possibilities for assessing possibilities for open solutions and closed  
 167 solutions.

168

169

170

	<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>THIS CONSULTATION?</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>			

171

172 So there can be several ways for organising different (sub)systems. In many cases there are  
173 problems with different concepts since many systems are developed by different communities.

174

**Proposal: Conceptual schemas of different systems could explicated.**

175

**Note: There can be a lot of variety with conceptual schemas in different systems.**

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This means different adjustments in different (sub)systems since different systems are developed with different conceptual schemas.

**Proposal: There could be assessment of different systems – can different systems be adjusted to comply with proposed (this consultation) concept schemas?**

**Proposal: Both options could be assessed:**

- 1) Systems handle consolidation of conceptual schemas **INSIDE** systems.
- 2) There are **EXTERNAL** systems which could handle consolidation of conceptual schemas.

Here can noted that there are unique systems used inside/outside of different communities. This means that different information systems have unique situations: some systems can be rather old, some systems are under development, some systems are to be terminated in the (near) future and

193 other different situations.

194

195 **Proposal: Perhaps both options have to be implemented – some systems handle**  
196 **consolidation INSIDE and some systems handle consolidation OUTSIDE.**

197

198 **Proposal: Need for different direct contacts (system to system) should be assessed**  
199 **critically.**

200

201 **Proposal: Need for using different documents should be assessed critically.**

202

203 **Note: Like noted earlier there can be some variation of conceptual schemas in different**  
204 **systems.**

205

206 **Actual reality / Different standards and standards versions**

207

208 Previously I have advocated open standards for different information systems.

209

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

214

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

221

222 However, creating a new standard means actual both administrative and technical work, and in  
223 some cases creating a new standard can last quite long. There are a lot of different standard setting  
224 organisations (SDO), and one comprehensive list is provided <sup>1</sup> for us by ConsortiumInfo.org.

225

226 **Proposal: NSW Fair Trading could assess different standards.**

227

228 **Proposal: Based on the assessment of different standards, there could be reasoned**  
229 **decisions to use some standards.**

230

231 **Supporting and/or developing different standard types?**

232

233 One of the main themes can be division standards: horizontal standards and vertical standards. What  
234 this means? Generally speaking, different ICT solutions will implement a large collection of  
235 different standards: open standards and closed standards. In many cases, different ICT solutions do  
236 not work together and this might not constitute a problem. However, in many cases different ICT

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

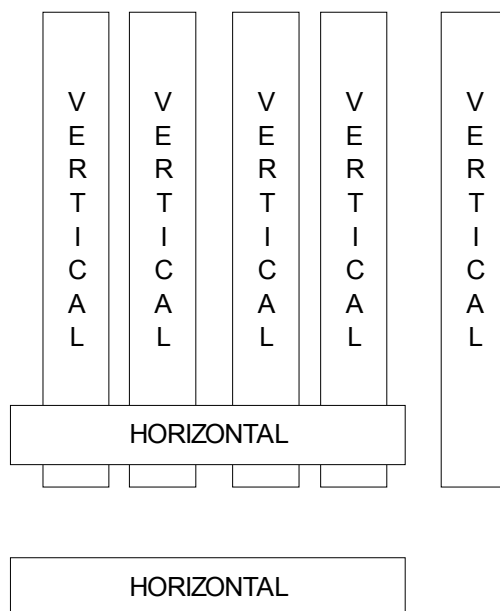


237 solutions has to work together seamlessly – possibly without further problems.

238

239 An example can be different email standards. There are numerous email systems developed with  
 240 numerous technologies (vertical), but the cooperation between numerous email systems is possible  
 241 with different (horizontal) email standards.

242



243

244

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

246

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

248

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

251

252 Personally I advocate using different horizontal standards. For example email standards (horizontal)  
 253 are implemented with very different technologies (vertical).

254

255 **Proposal: NSW Fair Trading could assess both vertical and HORIZONTAL standards.**

256

257 **Proposal: NSW Fair Trading could favour usage of HORIZONTAL standards.**

258

259 Here we can note that developing horizontal standards is very demanding compared to developing  
 260 vertical standards. Therefore NSW Fair Trading has to carefully assess situation of horizontal  
 261 standards before developing new horizontal standards. On the other hand NSW Fair Trading  
 262 could/can endorse and enforce usage of different horizontal standards.

263

264 Here we can note some problems:

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- some systems are based on **de-facto** standards
  - some systems are based on **de-jure** standards
  - there can be confrontations between **de-facto** and **de-jure** standards
  - there can be a monopoly situation in some domain
  - some standards may inhibit possible actions of some stakeholders
  - there can be a “standard war” in some domains
  - standards have different life-cycles
  - systems have different life-cycles
  - there can be mismatches between different life-cycles
  - there can be failed standards
  - there can be deprecated standards.

277

### 278 **An example of a horizontal standard – web feeds / RSS and Atom**

279

280 I have advocated usage of <sup>2</sup> web feeds (RSS and/or Atom) on many previous opinion documents. To  
281 be precise, there are some standards for web feeds: RSS 2.0 <sup>3</sup> standard and Atom <sup>4 5</sup> standards. There  
282 is also a list of RSS feed aggregators on <sup>6</sup> Wikipedia. There are different systems, which comply  
283 with these example standards (RSS and Atom) differently.

284



285

286

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

289

290 **Proposal: There could be different web feeds (RSS and/or Atom) for different**  
291 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**  
292 **solution.**

293

294 It can be said that web feeds can provide *real-time information* in some cases.

295

296 **Opinion: There can be possibilities to provide real-time information – possibilities**  
297 **depend on the unique situation in NSW!**

298

299 **Proposal: The possibilities for providing real-time information could be assessed**  
300 **together with different stakeholders.**

301

302 **Proposal: NSW Fair Trading could advocate usage of web feeds (RSS and/of Atom) in**

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2 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed), Web feed – Wikipedia article

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

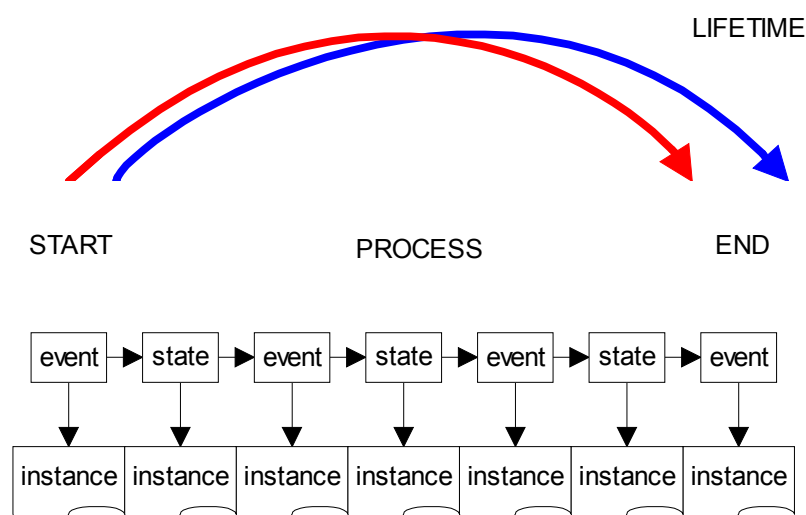
4 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

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

6 [https://en.wikipedia.org/wiki/Comparison\\_of\\_feed\\_aggregators](https://en.wikipedia.org/wiki/Comparison_of_feed_aggregators), Comparison of feed aggregators

303 different systems (horizontal) which then can implement other approved standards  
 304 (vertical).

305  
 306 **General summary: Processes, events, states, lifetime, instances, start and end**  
 307



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 309

### 310 Questions 1 and 2

311

312 **1. What information should the Register publish about a complaint and why?**

313

314 **2. What information should the Register publish about a trader and why?**

315

316 Here we can note that there can be process data, document data and lifetime data in an information  
 317 system.

318

319 **Proposal: Different data classes should be assessed: process data of complaints,**  
 320 **document data of complaints and lifetime data of complaints.**

321

322 Important concepts can noted: processes, events, states, lifetime, instances start and end. It can  
 323 noted that during the lifetime of an information system there can be significant changes with the  
 324 selected and implemented standards.

325

326 **Proposal: Based on the results of this consultation NSW Fair Trading could create a**  
 327 **roadmap for implementing different open and/or especially horizontal standards.**

328

329 It can noted that there are very cumbersome information systems on on different application fields.  
 330 Therefore NSW Fair Trading could have a clear roadmap for implementing different standards in  
 331 the near and distant future. NSW Fair Trading could formally join to some important (standards  
 332 developing) organisations based on the results of this consultation.

333

334 Systems can be terminated in some timeframes. Also some new systems can be created to have  
 335 more functions than the previously terminated systems. With a state-level contact point these  
 336 integration solutions can be consolidated in different state-level timeframes.

337  
 338 **Proposal: There could be some efforts to cataloguing state-level systems and federal**  
 339 **systems.**

340  
 341 **Proposal: Based on the mentioned catalogue there could be some development efforts**  
 342 **in the near future and in distant future.**

343  
 344 One option is to create a detailed roadmap for different phases of the proposed IT platform. With  
 345 this roadmap it could be easier to develop the proposed IT platform.

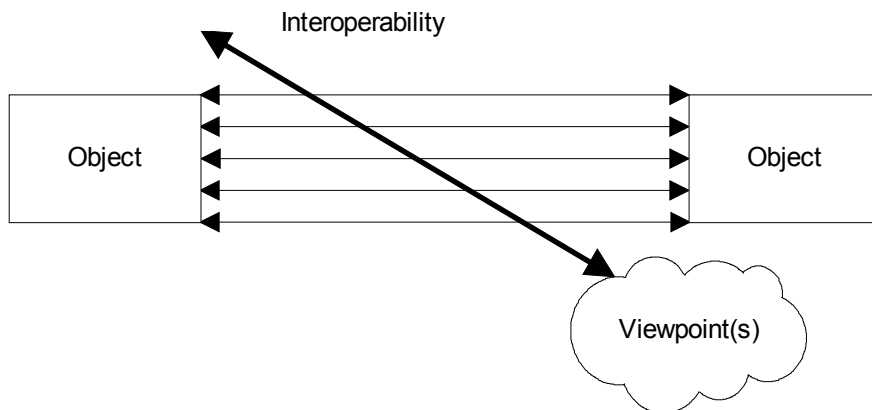
346  
 347 **Proposal: Detailed roadmap could be created.**

348  
 349 **Proposal: Detailed roadmap could part of more technical and more detailed**  
 350 **consultation.**

351  
 352 **Note: In some consultations I have proposed a roadmap, which could gradually move**  
 353 **to the previously explicated maximum solution for different information systems**

354  
 355 **Note: Actually enforcing different open technologies in different systems can take years**  
 356 **since there are different commitments with current/different systems.**

357  
 358 **Managing different viewpoints**  
 359



360  
 361 Here we can conclude, that there can be several viewpoints to be handled when developing different  
 362 information systems. There can be several viewpoints: e.g. (case) law, time, environment, waste,  
 363 quality, effectiveness, outsourcing, different technologies, information technology in specific,  
 364 money, security, internationalisation, anti-trust, competition, process models, etc.  
 365  
 366

367 **Proposal: NSW Fair Trading could collect information based on different viewpoints.**

368

369 Parts of interoperability in a system are based on different viewpoints. This consultation about APIs  
 370 is naturally one way of collecting information based on different viewpoints. Generally speaking  
 371 many processes are quite easy to model, but some viewpoint means rather long learning processes;  
 372 e.g. understanding parts of medical information (expertise) can demand a lot of learning.

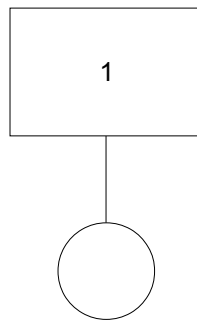
373

374 **Note: Implementing interfaces based on all possible viewpoints in a system can take**  
 375 **some time.**

376

377 **Different interfaces based on different viewpoints**

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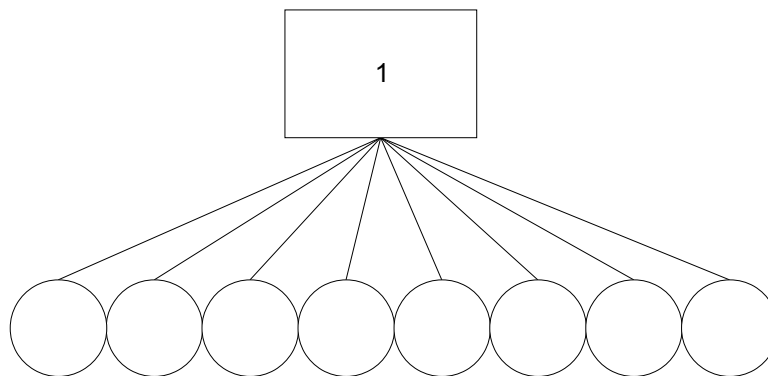


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380

381 It is possible that some information systems can provide only one interface. However, I have noted  
 382 that different viewpoints can mean different interfaces for an information system. Here we can note  
 383 that there can be more than one interface for a system.

384



385

386

387 Here we can note that this consultation is about different APIs. It can be noted that there will be  
 388 different interfaces for different purposes (viewpoints).

389

390 **Proposal: There could be serious assessment of different viewpoints.**

391

392 **Proposal: After serious assessment of different viewpoints there can be proposals for**

393 **different interfaces.**

394

395 **Question 15: Notice to traders?**

396

397 **Question 15:**

398 **(i) Should traders be notified in advance that they are going to appear on the**  
399 **Register for the first time?**

400 **(ii) If so, what period of notice should they be given?**

401

402 Here we can note that there could be specific interfaces (different viewpoints) for consumer, traders  
403 and NSW Fair Trading.

404

405 **Proposal: Based on the results of this opinion there could be several proposals of**  
406 **different interfaces for consumers, traders and NSW Fair Trading.**

407

408 When there are specific interfaces for different stakeholders it could be easier to add some  
409 information.

410

411 Here we can note one important issue based on the results of previous consultations.

412

413 **Proposal: There could be some serious efforts to create very simple and very readable**  
414 **documents for different purposes.**

415

416 Too often we give very complex legal texts (legalese) for average consumers and average company  
417 personnel. There are ways for presenting legal texts with more clarity. Since average consumers and  
418 average company personnel are NOT experts in law there should be more readable documents for  
419 average persons.

420

421 **Proposal: Based on the some serious efforts to create very simple and very readable**  
422 **(legal) documents it could be easier to develop interfaces for different stakeholders.**

423

424 Some answers based on the question 15 (i, ii):

425

426 **Proposal: There should be very readable documents and very easy interfaces for**  
427 **traders when a trader is notified for the first time – meaning some possible information**  
428 **added to the Register.**

429

430 **Question 13 and 14: record complaints against one member of the group against the group as**  
431 **a whole.**

432

433 **13. Should complaints about a particular franchise branch be recorded as complaints**  
434 **about the franchise brand as a whole?**

435

436 **14. Should the same approach be taken with chains and related companies/corporate**  
437 **groups?**

438

439

**Proposal: The process model of notifications for franchises/chains/parent companies/groups/etc. should be explicated well – especially very readable documents and very easy interfaces.**

440

441

442

443

I guess that franchises/chains/parent companies/groups/etc. can be very vigilant about the image of the company brand. Therefore the process of informing complaints for franchises/chains/parent companies/groups/etc. should be very well explicated.

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**Current reality / There are several systems without connections to other systems**

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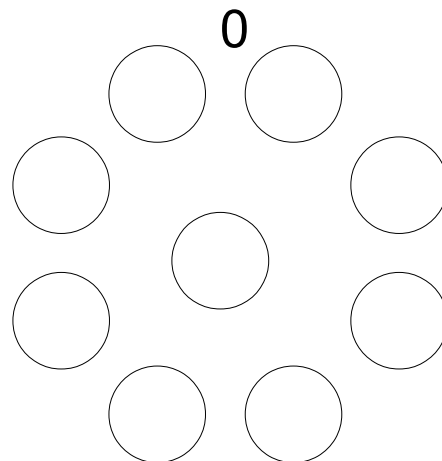
449

The current reality (0) is that several systems are not connected to other systems. However in the future there can be several ways for cooperation between systems. The problem in the future may be very complex system-to-system (1) connections.

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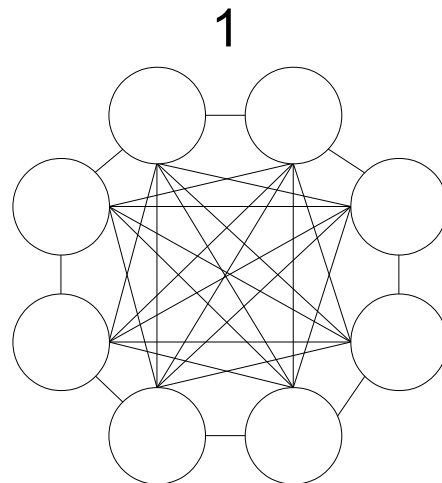


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**The current reality: Several systems without connections**

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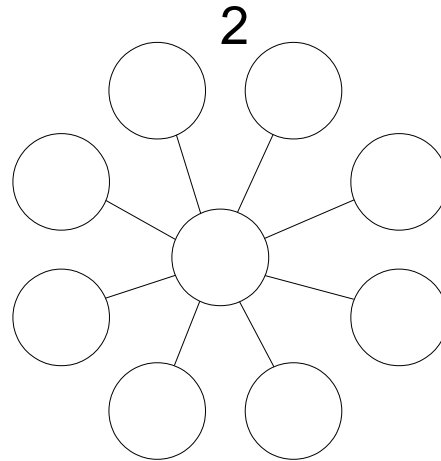
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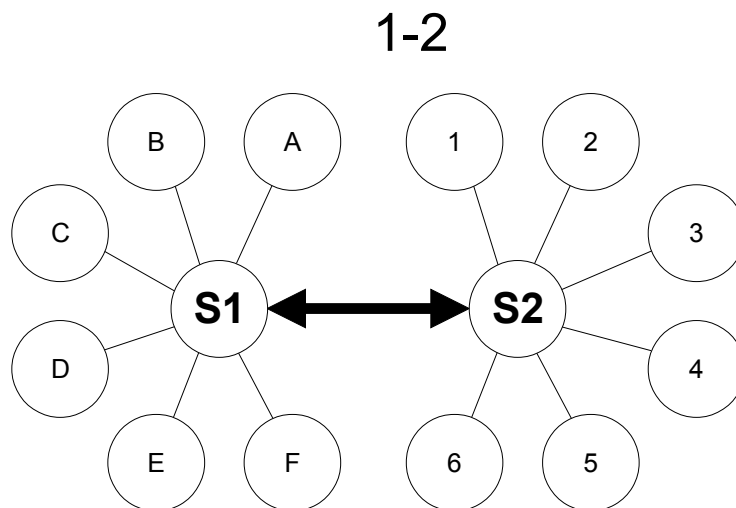
457 **The possible future: Very complex system-to-system relations and/or several connections**

458  
 459 Based this problem there are in many cases one central system (2) which can handle cooperation  
 460 between different (sub)systems. The problem with this option is the failure of the central system and  
 461 this can lead to unwanted outage of several (sub)systems.  
 462



463 **The possible future: One central system for cooperation between other systems**

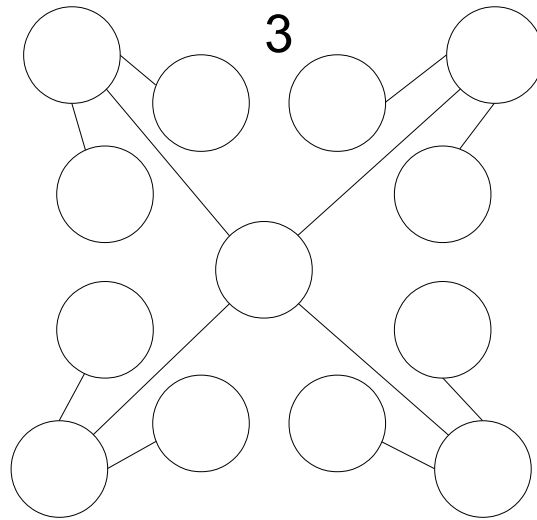
464  
 465  
 466 The next option could be some operation between some central (1-2) systems. In this way failure of  
 467 the central system (S1/S2) does not cause outages in all (sub)systems.  
 468



469 **The possible future: Some central systems (S1 ↔ S2) can have some cooperation**

470  
 471  
 472 One option (3) is to have a hierarchy between different system. In this way there cab some systems  
 473 which are not connected to the central system. With this approach not all (sub)systems face the  
 474 same problem with a failure in the central system.

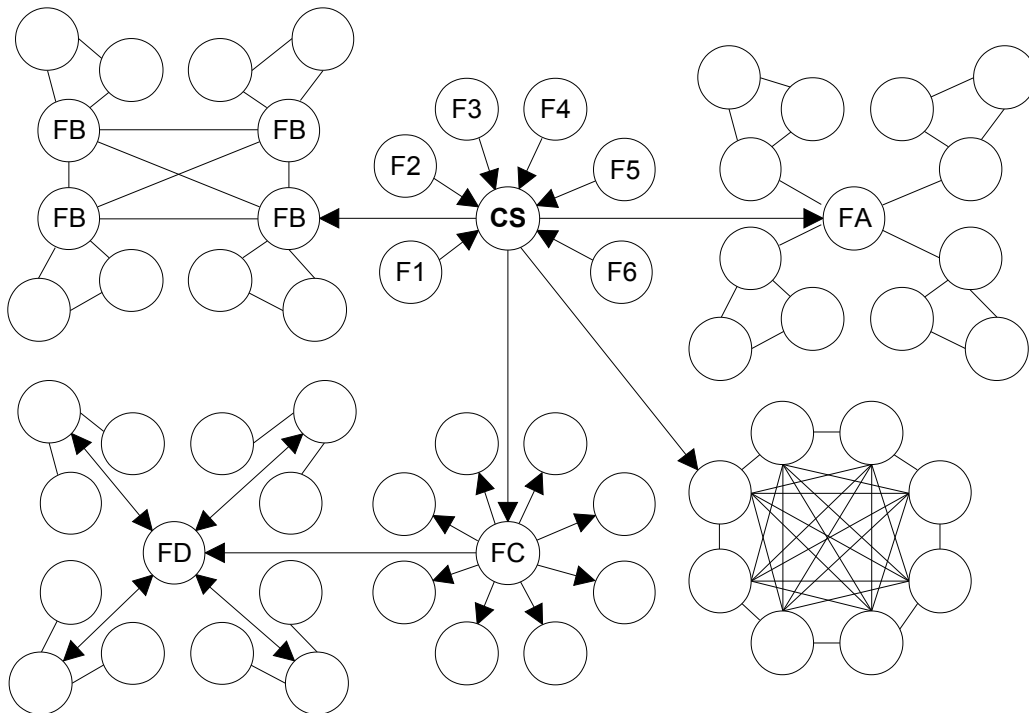




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**The possible future: Some systems are organised into a hierarchical structure**

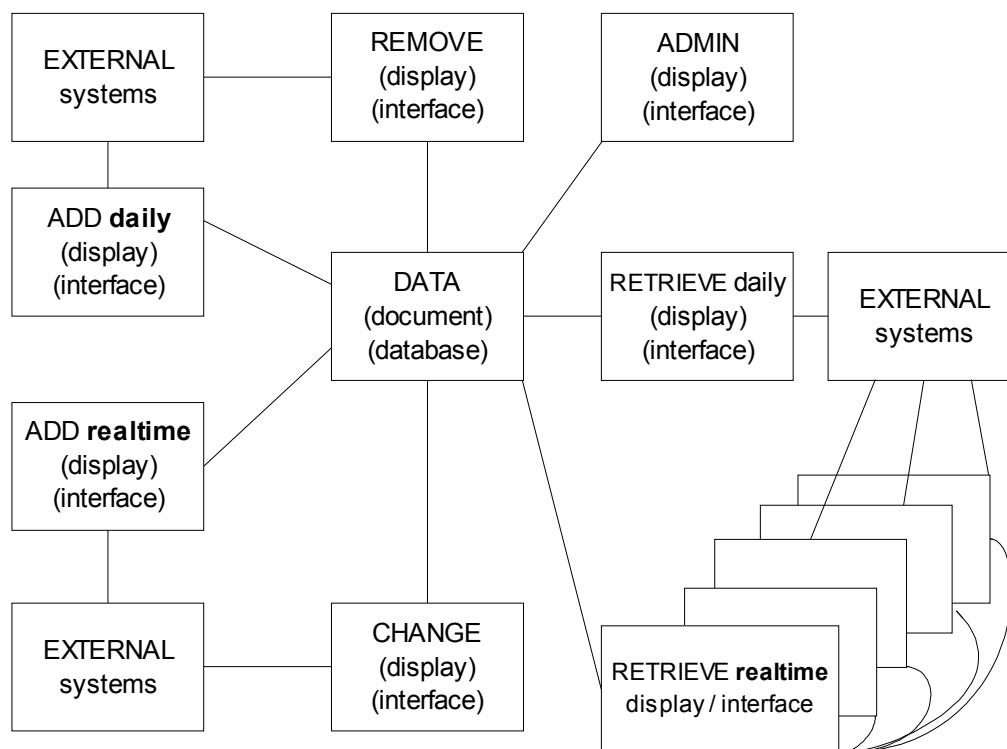
**The reality: There will be several layered systems developed by several stakeholder communities (both for-profit and non-profit communities).**



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**The reality: There will be complex cooperation networks between different systems**

Here we can note that there can some central systems (CS) and information from those central systems can be distributed to several other systems.



487  
488

489 Depending on systems there can be real-time connections and other connections with other  
490 timeframes – e.g. daily, weekly, monthly, etc.

491

492 **Question 6:**

493

494 **6. How often should the Register be updated (eg. monthly, quarterly, six monthly)?**

495

496 **Proposal: Based on the results of this consultation there can be serious assessment**  
497 **about timeframes for internal systems and external systems.**

498

499 **Proposal: There could a separation of archival systems and real-time systems.**

500

501 **Proposal: Separation of archival systems and real-time systems should be assessed**  
502 **when procuring the (possible) new Register.**

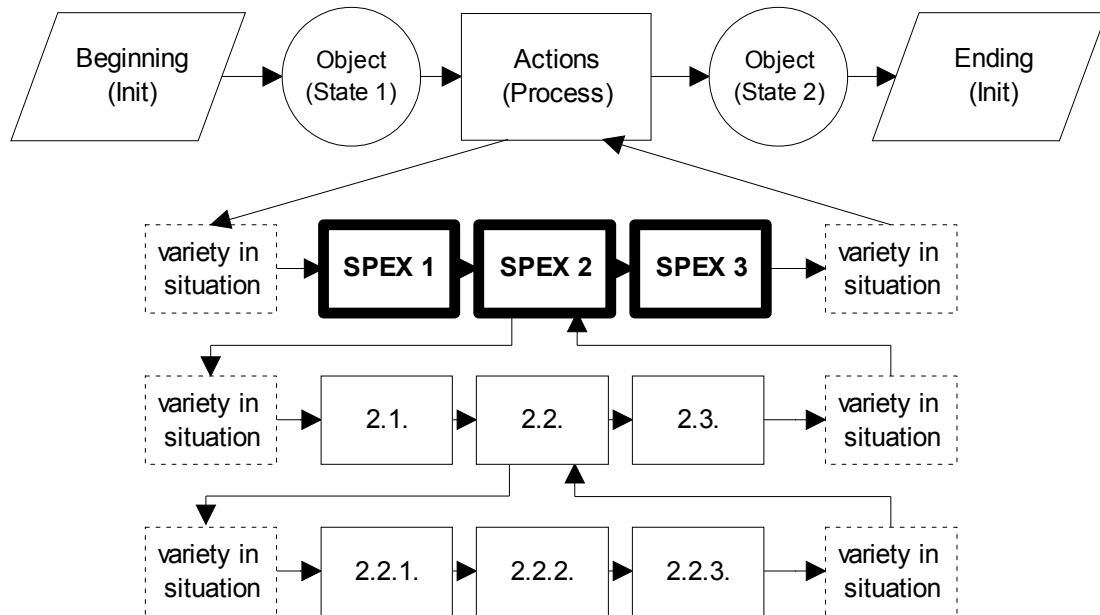
503

504 **What I have personally proposed?**

505

506 [Continues on the next page]

507



508  
509

510 Here we can differentiate following issues:

511

- 512 • object of a process
- 513 • beginning of a process
- 514 • ending of a process
- 515 • actions of a process
- 516 • variety in a situation.

517

518 There can be different objects: especially material, information and humans. Material and  
519 information is stable but humans are never in a stable state.

520

521 There could be some points in a process model where there is very detailed (**SPEX**) parts. Naturally  
522 in these parts (**SPEX**) there could be very detailed information about different concepts.

523

524 Since humans are learning entities there can be different shortcuts in different process models  
525 implemented in computerised systems.

526

527 **Standardising (SPEX) different parts of processes**

528

529 Based on the previously proposed actions there can be a clear understanding of different processes.  
530 It can noted that describing different processes can mean a lot of work for different stakeholders.

531

532 It can be noted here that describing different processes are implement in information systems which  
533 are hierarchically structured. So there is always some possible mismatches between actual process  
534 models and actual hierarchy of system.

535

536 Here we can note, that in a process some objects change their state in different stages.

537

538 **Proposal: After some serious assessment there could be some serious work for**  
539 **standardised (SPEX) interfaces and displays.**

540

541 **Proposal: Some parts of the processes could be standardised for interfaces (SPEX) for**  
542 **different stakeholders.**

543

544 **Proposal: Some standardised customer interfaces (SPEX) could be used for having**  
545 **better service processes for different stakeholders.**

546

547 It can be noted, that several systems could implement (SPEX) the same parts of different processes,  
548 even though the technology in different systems can be totally different.

549

550 **Organising more technical consultations?**

551

552 **Proposal: NSW Fair Trading could organise more technically oriented consultations**  
553 **based on results of this consultation.**

554

555 **Good luck!!!**

556

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

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561 [Continues on the next page]

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## ANNEX 1

I have constructed different opinions about different issues, and on the following web page are all written (PDF files) opinions:

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

**I have constructed specifically opinions related to information systems – both in English and in Finnish.**

**Here is the list of opinions related to information systems.**

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 13: Final Committee Draft ISO/IEC FCD3 19763-2

[http://www.jukkarannila.fi/lausunnot.html#nro\\_13](http://www.jukkarannila.fi/lausunnot.html#nro_13)

EN: Opinion 14: SFS discussion paper / SFS:n keskusteluasiakirja

[http://www.jukkarannila.fi/lausunnot.html#nro\\_14](http://www.jukkarannila.fi/lausunnot.html#nro_14)

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)

EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft

[http://www.jukkarannila.fi/lausunnot.html#nro\\_20](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_23)

- 608 EN: Opinion 24: ISO/IEC JTC 1 / SC 34 / WGs 1, 4 and 5 in Helsinki 14-17 June 2010  
609 [http://www.jukkarannila.fi/lausunnot.html#nro\\_24](http://www.jukkarannila.fi/lausunnot.html#nro_24)  
610
- 611 FI: Lausunto 29: Avoimen demokratian avoimen datan avaamisen detaljit (ADADAD)  
612 [http://www.jukkarannila.fi/lausunnot.html#nro\\_29](http://www.jukkarannila.fi/lausunnot.html#nro_29)  
613
- 614 EN: Opinion 30: Internet Filtering  
615 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
616
- 617 FI: Lausunto 31: Terveystieteiden tietotekniikasta  
618 [http://www.jukkarannila.fi/lausunnot.html#nro\\_31](http://www.jukkarannila.fi/lausunnot.html#nro_31)  
619
- 620 EN: Opinion 32: COMP/C-3/39.692/IBM - Maintenance services  
621 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
622
- 623 FI: Lausunto 33: Julkishallinnon tietoluovutusten periaatteet ja käytännöt  
624 [http://www.jukkarannila.fi/lausunnot.html#nro\\_33](http://www.jukkarannila.fi/lausunnot.html#nro_33)  
625
- 626 EN: Opinion 34: REMIT Registration Format  
627 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
628
- 629 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
630 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
631
- 632 FI: Lausunto 38: SADe-ohjelman avoimen lähdekoodin toimintamallin luonnos  
633 [http://www.jukkarannila.fi/lausunnot.html#nro\\_38](http://www.jukkarannila.fi/lausunnot.html#nro_38)  
634
- 635 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
636 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
637
- 638 EN: Opinion 41: AT.39398: observations on the proposed commitments  
639 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
640
- 641 EN: Opinion 43: Publication of extracts of the European register of market participants  
642 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
643
- 644 EN: Opinion 45: About ICT standardisation  
645 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
646
- 647 EN: Opinion 46: Review of the EU copyright rules  
648 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
649
- 650 EN: Opinion 47: Sharing or collaborating with government documents  
651 [http://www.jukkarannila.fi/lausunnot.html#nro\\_47](http://www.jukkarannila.fi/lausunnot.html#nro_47)  
652

- 653 FI: Lausunto 49: JSH 166 -suosituksen päivitys  
654 [http://www.jukkarannila.fi/lausunnot.html#nro\\_49](http://www.jukkarannila.fi/lausunnot.html#nro_49)  
655
- 656 EN: Opinion 52: Trusted Cloud Europe Survey  
657 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
658
- 659 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
660 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
661
- 662 EN: Opinion 54: Government Content Management System  
663 [http://www.jukkarannila.fi/lausunnot.html#nro\\_54](http://www.jukkarannila.fi/lausunnot.html#nro_54)  
664
- 665 EN: Opinion 55: European Energy Regulation  
666 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
667
- 668 EN: Opinion 56: National Identity Proofing Guidelines  
669 [http://www.jukkarannila.fi/lausunnot.html#nro\\_56](http://www.jukkarannila.fi/lausunnot.html#nro_56)  
670
- 671 FI: Lausunto 58: Puoluekokousaloitteet / 2010 ja 2014  
672 [http://www.jukkarannila.fi/lausunnot.html#nro\\_58](http://www.jukkarannila.fi/lausunnot.html#nro_58)  
673
- 674 EN: Opinion 59: Green paper on mobile Health  
675 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
676
- 677 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
678 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
679
- 680 EN: Opinion 61: European Register of Products Containing Nanomaterials  
681 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
682
- 683 FI: Lausunto 65: Lausuntopyyntö nettiäänestystyöryhmän väliraportista  
684 [http://www.jukkarannila.fi/lausunnot.html#nro\\_65](http://www.jukkarannila.fi/lausunnot.html#nro_65)  
685
- 686 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
687 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
688
- 689 FI: Lausunto 67: Valtioneuvoston hanketiedon esiselvityksestä  
690 [http://www.jukkarannila.fi/lausunnot.html#nro\\_67](http://www.jukkarannila.fi/lausunnot.html#nro_67)  
691
- 692 EN: Opinion 68: European Network Code Stakeholder Committees  
693 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
694
- 695 FI: Lausunto 69: Hallituksen esitys (luonnos 16.4.2015) vieraslajeista  
696 [http://www.jukkarannila.fi/lausunnot.html#nro\\_69](http://www.jukkarannila.fi/lausunnot.html#nro_69)  
697

698 EN: Opinion 70: Providing better APIs in New Zealand

699 [http://www.jukkarannila.fi/lausunnot.html#nro\\_70](http://www.jukkarannila.fi/lausunnot.html#nro_70)

700

701 EN: Opinion 71: Common Schema for the Disclosure of Inside Information

702 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)

703

704 EN: Opinion 72: Queensland biofuel mandate

705 [http://www.jukkarannila.fi/lausunnot.html#nro\\_72](http://www.jukkarannila.fi/lausunnot.html#nro_72)

706

707 EN: Opinion 73: Financial / Conceptual Frameworks

708 [http://www.jukkarannila.fi/lausunnot.html#nro\\_73](http://www.jukkarannila.fi/lausunnot.html#nro_73)

709

710 EN: Opinion 74: Enabling the Internet of Things

711 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)

712

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714 I have constructed different opinions about different issues, and on the following web page  
715 are all written (PDF files) opinions:

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

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**ANNEX 2**

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7 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.