TO: GROW-G4@ec.europa.eu

Targeted consultation on eForms – the next generation of public procurement standard forms

First of all, a lot of thanks to Directorate General for Internal Market, Industry, Entrepreneurship and SMEs 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]
The background material is a large collection of important documents

Here we can note that the background material is a large collection of important documents. I have not read all documents.

This document is about process models about public procurement in European Union.

A simple presentation of a process

Here we can note that there can be different processes for public procurement.

Proposal(s):
1) The process models for public procurement could be assessed.
2) There can be different process models for different types for public procurement.

Defining some parts of a process – a lot of details (SPEX)

Following figure notes that some parts of a process can be presented in a detailed way (SPEX).

Here we can there can be some variety in different situation when implementing some processes.
Proposal(s):

3) There could be some modelling work for processes based on the results of this consultation.

4) Based on the possible modelling effort there could some very detailed phases (SPEX) for process models.

Problems with clarity and unclarity when doing some public procurement
Here we can note that there can be clear and unclear processes when doing some public procurement.

The number of different interfaces?

![Diagram showing the number of different interfaces for different stakeholder groups.]

Proposal(s):
5) Based on the results of this consultation there could be some modelling work for different interfaces.
6) Different stakeholder groups (may) need different interfaces.

Usability of different interfaces?

![Diagram showing high and low usability against number of features: too few, enough, too much features?]

Here we can note that there can be usable and non-usable interfaces. Therefore the modelling work for different user interfaces should result simple interfaces which are not complicated.

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Proposal(s):
7) There could be some modelling for different interfaces.
8) Different interfaces for different stakeholder groups should be very usable and very simple.

System cooperation based on direct system-to-system connections and documents

Here we can note that system cooperation can be based on direct system-to-system connections and documents.

Proposal(s):
9) Different system-to-system connections could be assessed after this consultation.
10) Need for different documents for transmitting data between systems could be assessed after this consultation.

Final remarks / Next generation eForms

Developing next generation eForms is naturally important for public procurement.

Processes for public procurement can vary and therefore there could be some modelling work for different processes. Also detailing different parts (SPEX) of processes is important.

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ANNEX 1

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

EN: Opinion 1: Review of the rules on access to documents
http://www.jukkarannila.fi/lausunnot.html#nro_1

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](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](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](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](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](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](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](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_93)

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[Continues on the next page]
ANNEX 2

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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.