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2 TO: JUST-COLLOQUIUM@ec.europa.eu

3 European Commission

4 Directorate-General for Justice and Consumers

5

6

7 **2016 Annual Colloquium on fundamental rights /**

8 **Public consultation on "MEDIA PLURALISM AND DEMOCRACY"**

9

10 First of all, a lot of thanks to Directorate-General for Justice and Consumers for organising this
11 important consultation.

12

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

14

15 This opinion does not contain:

16 – any business secrets

17 – any trade secrets

18 – any confidential information.

19

20 This opinion is public.

21 Directorate-General for Justice and Consumers can add PDF file of this opinion to a relevant web
22 page.

23

24 Annex 1 holds information about previous consultations on the European Union level.

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

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36 signed electronically

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40 [Continues on the next page]

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43 **Some additions for the answers given by the EUSurvey system**

44

45 On this document there are some additions for the answers given by the EUSurvey system. This
 46 opinion contains figures which are can not be added for the answers given by the EUSurvey system.

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48 **One simplification**

49

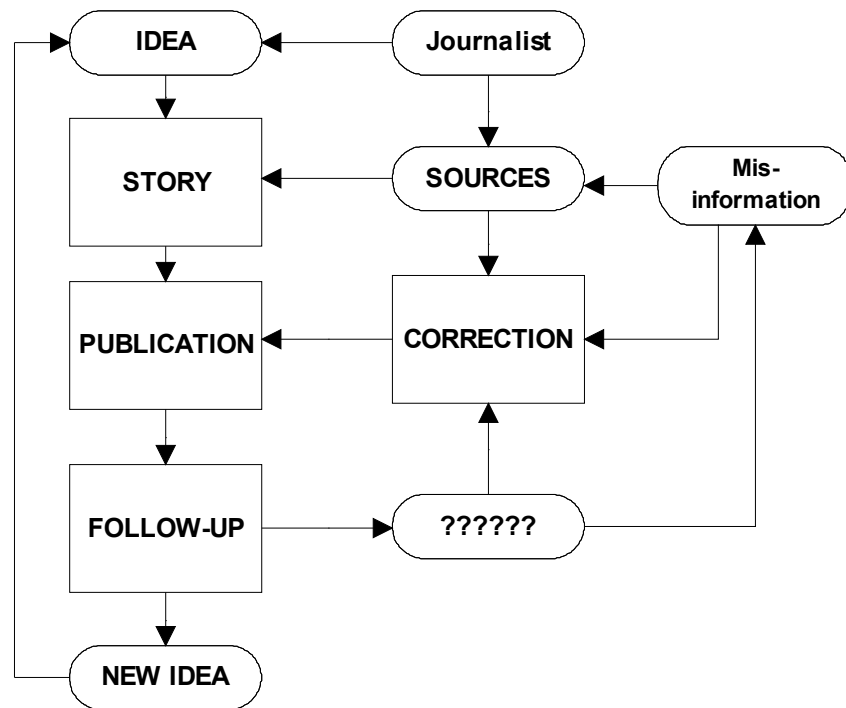
50 10 June 2013 I gave an opinion (Opinion 40) assessing ¹ following issues:

- 51 • media freedom and pluralism
- 52 • independence of audiovisual regulatory bodies

53

54 Based on those opinions I have constructed following figure.

55



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57

58 One clear problem is misinformation. Also correcting different misinformed claims should be
 59 handled efficiently. Problem of misinformation is accelerated since electronic networks can spread
 60 misinformation very efficiently.

61

62 **Media pluralism – possible problems?**

63

64 One issue is naturally “new” media which is not like “traditional” media. “New” media can be
 65 internet-only solutions and possibly not following guidelines for journalist; e.g. in Finland we have

1 Check annex 1

66 guidelines ² for journalists and an annex (Material generated by the public on a media website).

67

68 Naturally there should be journalistic freedom when publishing news based on different viewpoints.

69

70 **Some proposals for handling misinformation / Identifiers**

71

72 Here we can make a comparison to ^{3 4} Digital Object Identifier (DOI). DOI is a system for having
73 unique identifiers for scientific articles. On the European Union level ⁵ Publications Office of the
74 European Union is one of the DOI Registration Agencies. Each DOI is unique and permanent. A
75 document keeps the same DOI for its entire lifetime and, if ever the document is deleted, the DOI
76 will not be reused. An example of the DOI identifier can presented.

77

78 **doi:10.2788/14231**

79

80 The prefix (before slash) is assigned to an organisation which can register DOI names. Following
81 the prefix (separated by a forward slash) is the suffix (unique to a given prefix) to identify the
82 entity.

83

84 Resolving a DOI name can be done on the following web page

85

86 <https://dx.doi.org>

87

→ an example → add 10.2788/14231 to the search field.

88

→ this leads to actual web page of that publication (doi:10.2788/14231).

89

90 Like said before DOI means unique identifiers for scientific articles and one DOI user is
91 Publications Office of the European Union (Publications Office).

92

93 **More and more identifiers (ID)**

94

95 DOI is a good example of a new identifier (ID). New identifiers (ID) are created all the time based
96 on digitalisation of everything.

97

98 In the previous consultations there has been discussion about different identifiers (ID) in the
99 different systems. It can be noted from the previous opinions, that there will be several and different
100 identifiers (ID) for different levels. On the European Union level there can be several identifiers
101 (ID), e.g. following:

102

* global identifiers (ID)

103

* EU-wide identifiers (ID)

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* general member state identifiers (ID)

105

* several identifiers (ID) in member states.

106

2 http://www.jsn.fi/en/guidelines_for_journalists/

3 <http://www.doi.org>

4 https://en.wikipedia.org/wiki/Digital_object_identifier

5 <http://publications.europa.eu/en/web/about-us/who-we-are>

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Proposal: There could be a systematic review of different identifiers (ID).

It can be noted, that some member states (EU) are federations, and different federal states can have their own identifiers (ID).

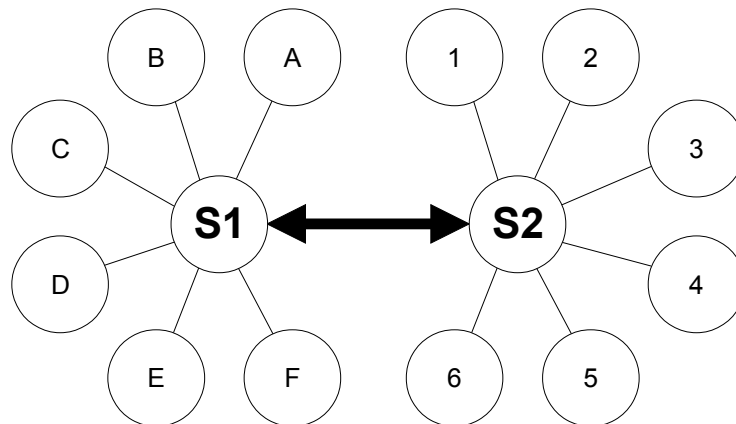
Examples of these identifiers are following:

- 1) Facebook ID for an individual person
- 2) Facebook ID for the individual up-dates of individuals
- 3) Data Universal Numbering System (D-U-N-S)
- 4) Reuters instruments codes (RICs)
- 5) Social security code for individual citizens in the European Union member states
- 6) Business identity code for a company in an European Union member state
- 7) Value added tax code for a company in an European Union member state.

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

Added value of different identifiers (ID)?

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Here we can note possible cooperation between different systems and usually cooperation between different systems means using different identifiers (ID). There can be some central (S1 ↔ S2) systems which collect information from other systems (A-F, 1-6) which have own identifiers (ID).

Proposal for identifiers (ID) for media solutions

Based on the previous ideas of identifiers (ID) there could be following issues when creating

138 different identifiers (ID) for media solutions:

139

- 140 • identifiers (ID) for media organisations (e.g. newspaper or television channel)
- 141 • identifiers (ID) for journalists
- 142 • identifiers (ID) for stories provided by media organisations
- 143 • identifiers (ID) for corrections of different stories.

144

145 **Proposal: A serious assessment of different identifiers (ID) for media solutions could be**
 146 **done on the European Union level.**

147

148 Naturally following identifiers (ID) could be assessed:

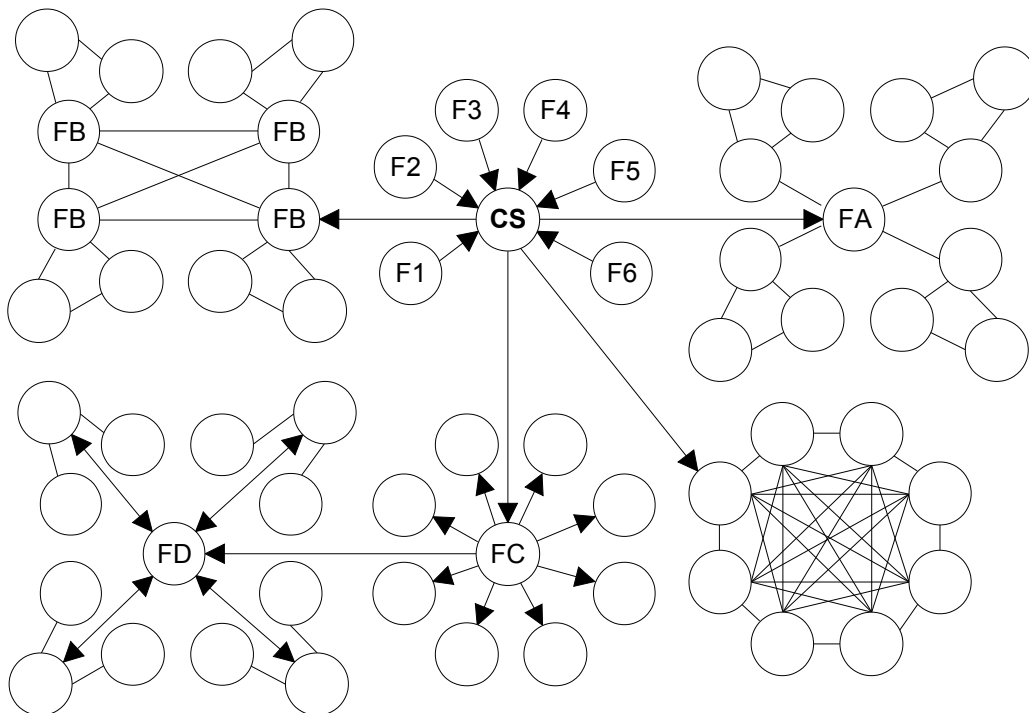
149

- 150 * **global identifiers (ID)**
- 151 * **EU-wide identifiers (ID)**
- 152 * **general member state (EU) identifiers (ID)**
- 153 * **several identifiers (ID) in members states (EU).**

154

155 **Problem of layered information systems**

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159 Naturally there can be a central system (CS) on some occasions. A central system (CS) could handle
 160 the problem of several identifiers (ID) on different levels. In reality there can be several layers for
 161 different systems. Then there can be several formats (e.g. F1-F6, FA-FD) which can be based on
 162 standardisation efforts.

163

164

Proposal: A serious assessment of layered information systems could be done on the European Union level.

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What could be done on the European Union level?

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The main issues addressed in this Opinion are:

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171

1) The challenge of real-time misinformation

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2) Mitigating the real-time misinformation with different IDs for (inter alia) stories, actor, factual information, misinformation

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3) The problem of layered IDs nationally, EU-wide and globally

175

4) Some solutions for layered IDs.

176

177

It can be said, that there will be several formats / standards, which can be free and public, 2) private and commercial, 3) not standardised, 4) standardised, 5) national, 6) international, 7) official, 8) non-official, 9) obsolete. And naturally there are several combinations (1 to 9).

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Proposal: Therefore European Commission could do following:

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1) **Follow the standards / formats landscape in the media landscape**

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2) **Encourage usage of public and free standards in the media landscape**

185

3) **Possible fund and advise the development of public and free standards in the media landscape**

186

187

4) **Assess the situation with private and commercial identifiers (ID) in the media landscape**

188

189

5) **Possibly enforce some opening the usage of interfaces private and commercial identifiers (ID) in the media landscape (cf. RICs case)**

190

191

6) **Active cooperation with global partners which provide different IDs in the media landscape.**

192

193

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Implications for media pluralism and democracy?

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When problem of (real-time) misinformation is handled more efficiently there can be some new solutions for correcting misinformation.

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Opinion: Media pluralism and democracy are very important issues but *factual information* should be basis for media pluralism and democracy.

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

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206 I have advocated usage of web feeds⁶ on several previous opinion documents. Actually there are
207 two standards for web feeds: RSS^{7 8} and Atom^{9 10 11}.

208

209 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
210 **informations systems (EU / Member states).**

211

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

214

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

218

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

220

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

223

224 It can be noted, that different back-office systems (with a wide variety of different technologies) can
225 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
226 kind solutions front-office systems dont need direct system-to-system communications with back-
227 office systems.

228

229

230 **Good luck !!!!!!!**

231

232 This Opinion is quite limited and probably other opinions will result some constructive ideas.

233

234

235 [Continues on the next page]

236

6 https://en.wikipedia.org/wiki/Web_feed

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

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

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

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

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

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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

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

- 282 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
283 http://www.jukkarannila.fi/lausunnot.html#nro_20
- 284 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
285 http://www.jukkarannila.fi/lausunnot.html#nro_21
286
- 287 EN: Opinion 23: Public consultation on the review of the European Standardisation System
288 http://www.jukkarannila.fi/lausunnot.html#nro_23
289
- 290 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
291 http://www.jukkarannila.fi/lausunnot.html#nro_27
292
- 293 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
294 http://www.jukkarannila.fi/lausunnot.html#nro_28
295
- 296 EN: Opinion 30: Internet Filtering
297 http://www.jukkarannila.fi/lausunnot.html#nro_30
- 298 NOTE: Organised by the European Committee for Standardization (CEN) ¹²
299
- 300 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
301 http://www.jukkarannila.fi/lausunnot.html#nro_32
302
- 303 EN: Opinion 34: REMIT Registration Format
304 http://www.jukkarannila.fi/lausunnot.html#nro_34
- 305 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ¹³
306
- 307 EN: Opinion 35: Exploiting the employment potential of the personal and household services
308 http://www.jukkarannila.fi/lausunnot.html#nro_35
309
- 310 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
311 http://www.jukkarannila.fi/lausunnot.html#nro_37
312
- 313 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
314 http://www.jukkarannila.fi/lausunnot.html#nro_39
315
- 316 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
317 http://www.jukkarannila.fi/lausunnot.html#nro_40
318
- 319 EN: Opinion 41: AT.39398: observations on the proposed commitments
320 http://www.jukkarannila.fi/lausunnot.html#nro_41
321
- 322 EN: Opinion 42: Opening up Education
323 http://www.jukkarannila.fi/lausunnot.html#nro_42
324

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

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

- 325 EN: Opinion 43: Publication of extracts of the European register of market participants
326 http://www.jukkarannila.fi/lausunnot.html#nro_43
327 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
328
- 329 EN: Opinion 44: Evaluation policy guidelines
330 http://www.jukkarannila.fi/lausunnot.html#nro_44
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- 332 EN: Opinion 45: About ICT standardisation
333 http://www.jukkarannila.fi/lausunnot.html#nro_45
334
- 335 EN: Opinion 46: Review of the EU copyright rules
336 http://www.jukkarannila.fi/lausunnot.html#nro_46
337
- 338 EN: Opinion 51: European Area of Skills and Qualifications
339 http://www.jukkarannila.fi/lausunnot.html#nro_51
340
- 341 EN: Opinion 52: Trusted Cloud Europe Survey
342 http://www.jukkarannila.fi/lausunnot.html#nro_52
343
- 344 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
345 http://www.jukkarannila.fi/lausunnot.html#nro_53
346 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
347
- 348 EN: Opinion 55: European Energy Regulation
349 http://www.jukkarannila.fi/lausunnot.html#nro_55
350 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
351
- 352 EN: Opinion 59: Green paper on mobile Health
353 http://www.jukkarannila.fi/lausunnot.html#nro_59
354
- 355 EN: Opinion 60: Cross-border inheritance tax problems within the EU
356 http://www.jukkarannila.fi/lausunnot.html#nro_60
357
- 358 EN: Opinion 61: European Register of Products Containing Nanomaterials
359 http://www.jukkarannila.fi/lausunnot.html#nro_61
360
- 361 EN: Opinion 64: Corporate Social Responsibility - European Commission
362 http://www.jukkarannila.fi/lausunnot.html#nro_64
363
- 364 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
365 http://www.jukkarannila.fi/lausunnot.html#nro_66
366
- 367 EN: Opinion 68: European Network Code Stakeholder Committees
368 http://www.jukkarannila.fi/lausunnot.html#nro_68
369 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

370

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

372 http://www.jukkarannila.fi/lausunnot.html#nro_71

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

374

375 EN: Opinion 74: Enabling the Internet of Things

376 http://www.jukkarannila.fi/lausunnot.html#nro_74

377 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)

378

379 EN: Opinion 80: Mandatory Transparency Register

380 http://www.jukkarannila.fi/lausunnot.html#nro_80

381

382 EN: Opinion 84: Revision of the European Interoperability Framework

383 http://www.jukkarannila.fi/lausunnot.html#nro_84

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435 The English explanation is on the following web page:

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439



14 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.