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2 European Commission
3 Directorate-General for Education and Culture
4 Unit A2 – Skills and Qualification
5 MADO 9/60
6 B-1049 Brussels
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9 **Reference: Consultation on "Opening up Education – a proposal for a European Initiative to**
10 **enhance education and skills development through new technologies"**
11

12 First of all, a lot of thanks to the Directorate-General for Education and Culture of organising this
13 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 Directorate-General for Education and Culture can add the PDF file of the Opinion to a relevant
25 webpage.
26

27 Annex 2 holds information about disclaimers and copyright.
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31 Best Regards,
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35 Jukka S. Rannila
36 citizen of Finland
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38 signed electronically
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42 [Continues on the next page.]
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44 **General notes based on the previous consultations**

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46 It can be noted, that in the Annex 1 there are links ¹ for the previous opinions.

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48 The general note is, that some figures have changed during the timeframe from the first opinions to
49 the last opinion.

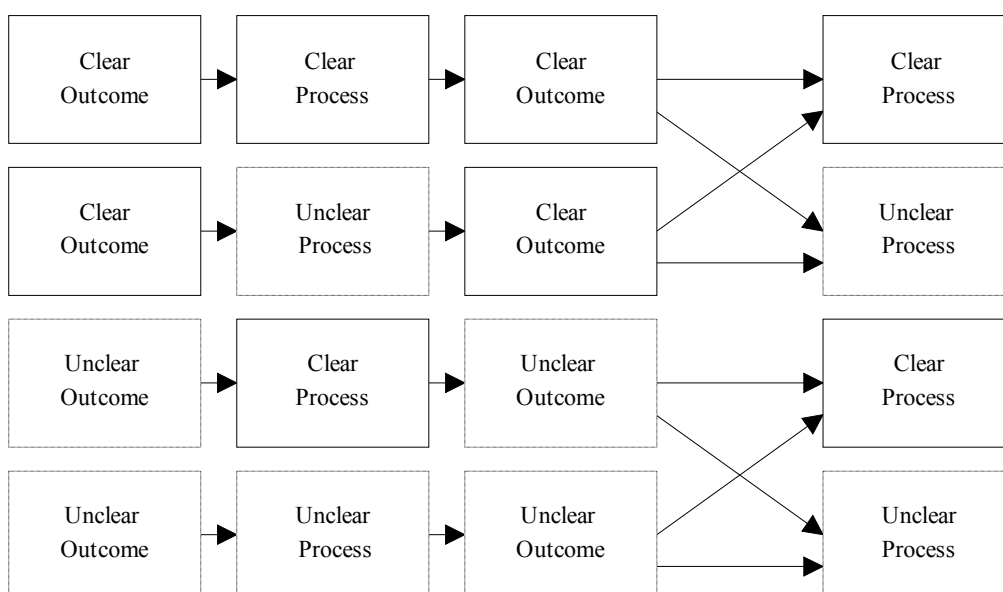
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51 **Main challenge?**

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53 In the introduction of the consultation document (PDF) there is information about different
54 solutions for open educational resources. The general note is, that there are numerous experiments
55 for open educational resources.

56
57 **Standardisation possibilities?**

58
59 At the moment there is not a single theory for the learning, and there are several rival theories for
60 learning. As a general note, we can conclude that the process of learning is not yet standardised. For
61 this reason, we have to differentiate following options: clear or unclear outcome and clear or
62 unclear process. The following figure explicates the combinations of clarity and/or unclarity.

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66 Therefore, the standardisation is easier for clear outcomes and clear processes.

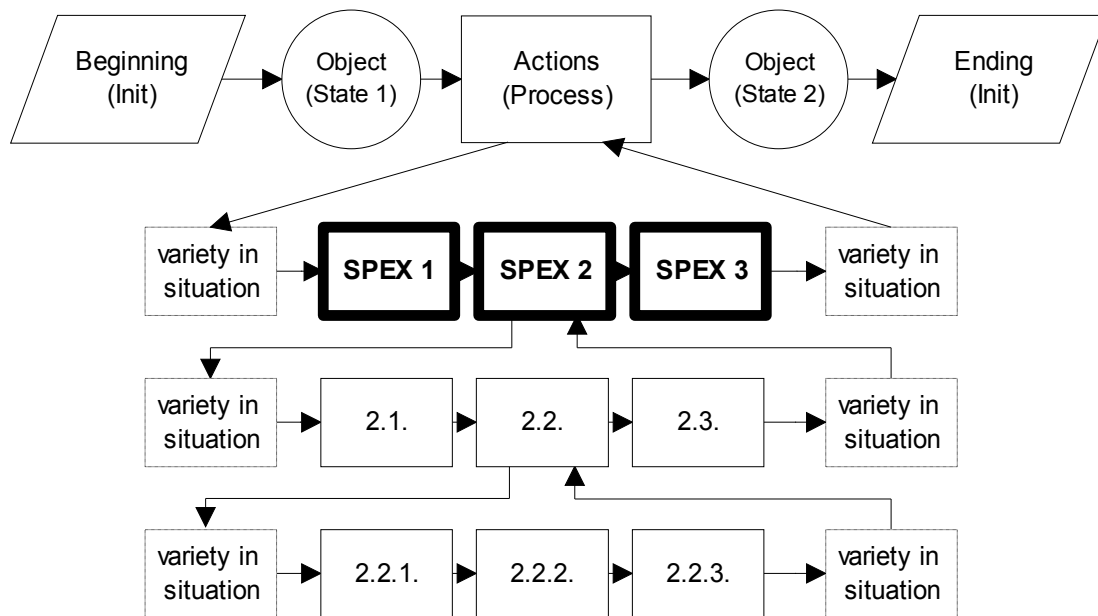
67

68 **Opinion 1: The Commission could generally explicate first the clear outcomes and**
69 **clear processes in the current solutions for open educational resources.**

70

¹ <http://www.jukkarannila.fi/lausunnot.html>, The general web page for the published opinions of Jukka Rannila, contains also opinions in Finnish.

71 It can be said, that after explicating first the clear outcomes and clear processes there can be very
 72 detailed possibilities (SPEX) for the standardisation of the information and communication
 73 technology. In the realm of learning there is still a lot of variety in situations, and not all of the
 74 learning process can be standardised. In the process of learning, the object is the mind of a person
 75 interested in a specific area of knowledge. After engaging in the open educational resources, the
 76 mind of an individual person can be changed.
 77



78
79

80 **Opinion 2: The Commission could specify in a very detailed way possibilities for**
 81 **standardised and computerised parts in the open educational resources.**

82

83 **Opinion 3: There can be global solutions for possibilities for standardised and**
 84 **computerised parts in the open educational resources.**

85

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

90

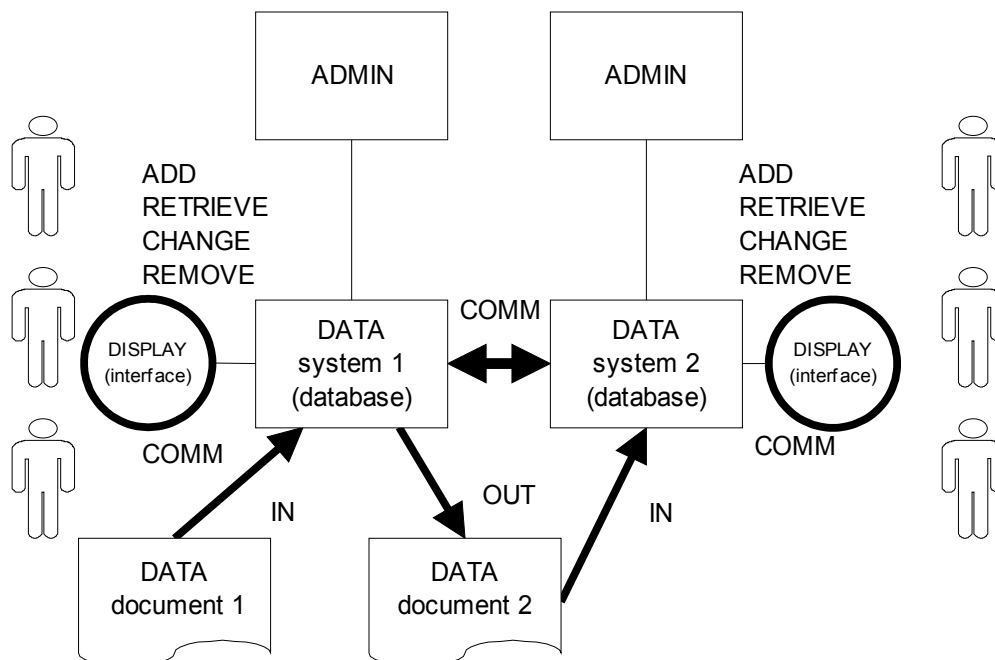
- 91 * global identifiers (ID)
- 92 * EU-wide identifiers (ID)
- 93 * general member state identifiers (ID)
- 94 * several identifiers (ID) in a member state.

95

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

98

99 **A simple description for computerised systems**
 100



101
 102
 103 There some basic functions in computerised systems

- 104 • ADD data
- 105 • RETRIVE data
- 106 • CHANGE data
- 107 • REMOVE data
- 108 • ADMINistration of a system.

109
 110 These functions use/change/etc. data in two forms:

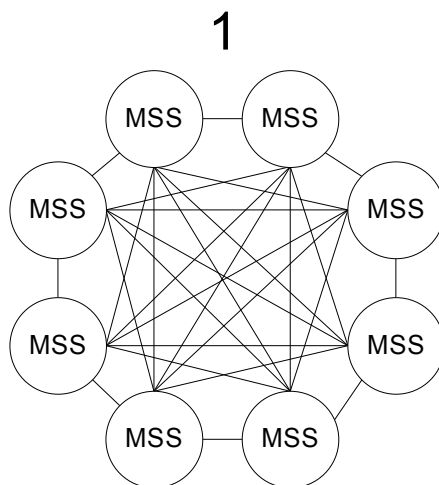
- 111 • DOCUMENT
- 112 • DATABASE.

113
 114 Like the figure indicates, the documents can actually change to the database information in a
 115 database; the results is naturally new IDs and new databases.

116
 117 **National level / Member state?**

118
 119 It can be concluded, that a specific open educational resource in the national level in a member state
 120 is actually distributed in several systems in a member state. Different member state systems (MSS)
 121 are then integrated in different layers. In other words, the original content is distributed totally and
 122 partially to several systems.

123



124
125

126 The problem with several many-to-many systems is naturally the needed cooperation between
127 different systems. In reality, this means that modifications in a single system means more
128 modifications in all cooperating system. Therefore, many-to-many systems is not the best solution.

129

130 **Need for another group of different IDs in the national level?**

131

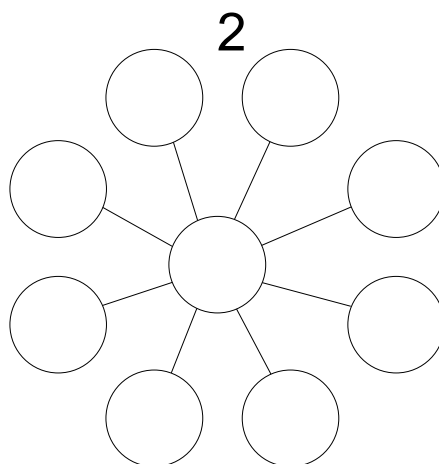
132 Unfortunately, the proposals made before mean yet another problem with different IDs. Do we need
133 following IDs:

134

- 135 • national IDs for different communities providing open educational resources?
- 136 • national IDs for different open educational resources?

137

138 Naturally, this situation leads us to the “Clearing House” solutions, where different IDs are
139 compared, evaluated, cross-referenced, etc. The “Clearing House” then gives its own ID for general
140 consumption. The following figure gives an idea of the “Clearing House” solution, which means
141 one-to-many relations.



142

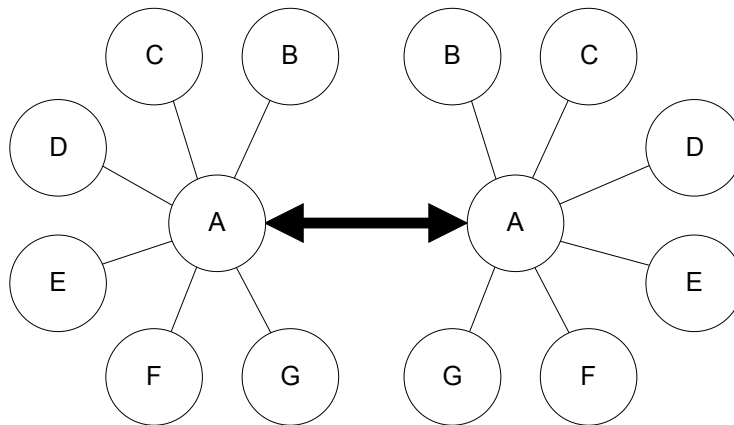
143

144 The practical reality is, that different “Clearing House” solutions can be combined, and therefore

145 the original IDs are hidid.

146

1-2



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149 **EU-wide level?**

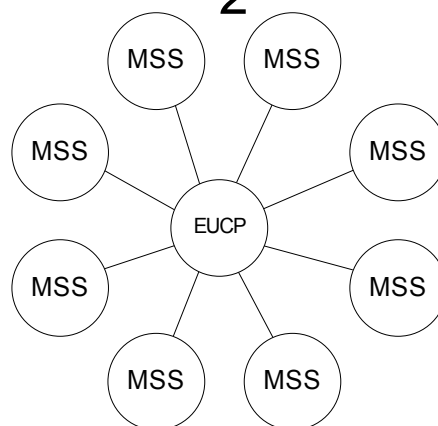
150

151 This leads to the question of a European Contact Point (EUCP) for different member state systems

152 (MSS); also it can be said being a “Clearing House”.

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155

156 In the current situation, European Union member states (and some co-operation states) have their

157 own internal IDs for several information systems. Also, the members states organised as a

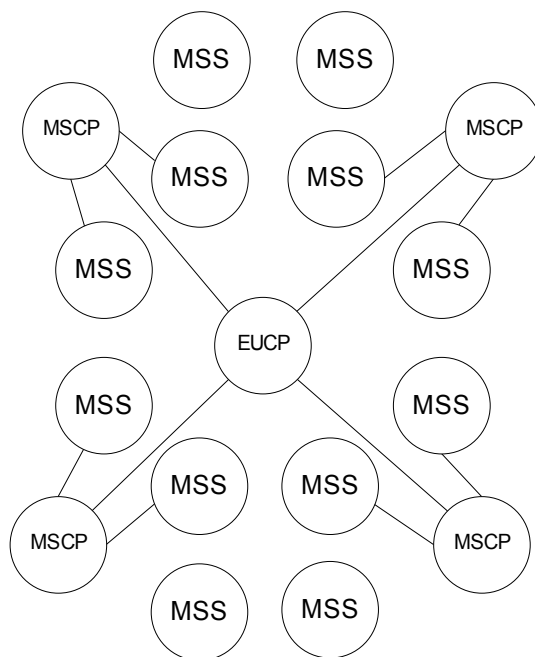
158 federation have their own internal problems with state-level IDs.

159

160 On the other hand, there are some working examples of joined or federated EU-wide registers.

161 However, the amount of administration and needed legally binding agreements is considerable.
162

3



163
164

165 The solution can be, that member states have own Member State Contact Points (MSCP) and
166 different state level systems are combined gradually. Then the member state system IDs can be used
167 in the European Contact Point (EUCP).

168

169 **Opinion 4: The Commission can collect together all information about different IDs for
170 open educational resources.**

171

172 **Opinion 5: The Commission can propose a specific EU-wide identifier (ID) for open
173 educational resources.**

174

175 **Global level?**

176

177 The problem is multiplied in the global level, when there are several IDs for open educational
178 resources – once again in several layers; e.g. national and regional IDs.

179

180 **Opinion 6: The Commission can propose different ways to distribute the EU-wide
181 identifiers (ID) of open educational resources to global systems of open educational
182 resources.**

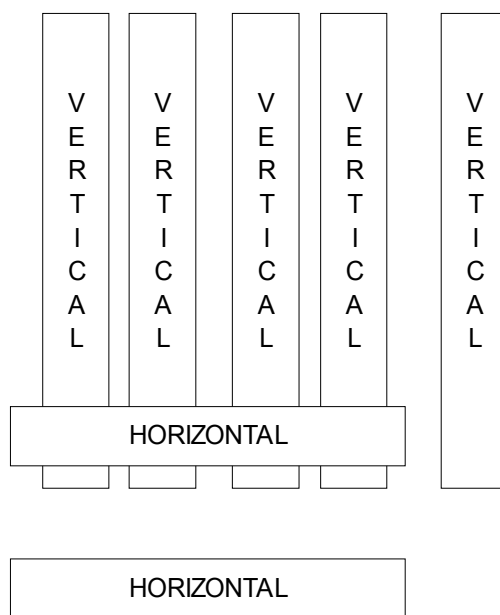
183

184 **Problem of the layered systems?**

185

186 It can noted, that there will be several open educational resource systems, and the cooperation
 187 between very different system is a serious problem.

188
 189 From the standardisation point of view, there can be horizontal and vertical standards.
 190



191
 192
 193 It can be said, that in some point there will be need for horizontal standardisation. This means, that
 194 several vertical systems can cooperate in different levels. The general development is, that there can
 195 be several vertical solutions for the same computerisation area. An example for this standardisation
 196 is the email standard (horizontal), when there are numerous email systems (vertical) created with
 197 very wide variety of technologies.

198
 199 **Opinion 7: The Commission can collect all relevant information about horizontal**
 200 **standards for open educational resources.**

201
 202 **Opinion 8: The Commission can collect all relevant information about vertical**
 203 **standards for open educational resources.**

204
 205 Like said before, there can now be several IDs and several standards. It can be noted, that standards
 206 can be proprietary or open/free. Using different IDs can mean paying different usage fees, or using
 207 different IDs can open/free.

208
 209 In practical reality, there is always different IDs and different standards in the market place, and
 210 therefore there is need for using both open/free and commercial IDs and standards. In some cases,
 211 we are forced by market forces to use commercial IDs and standards.

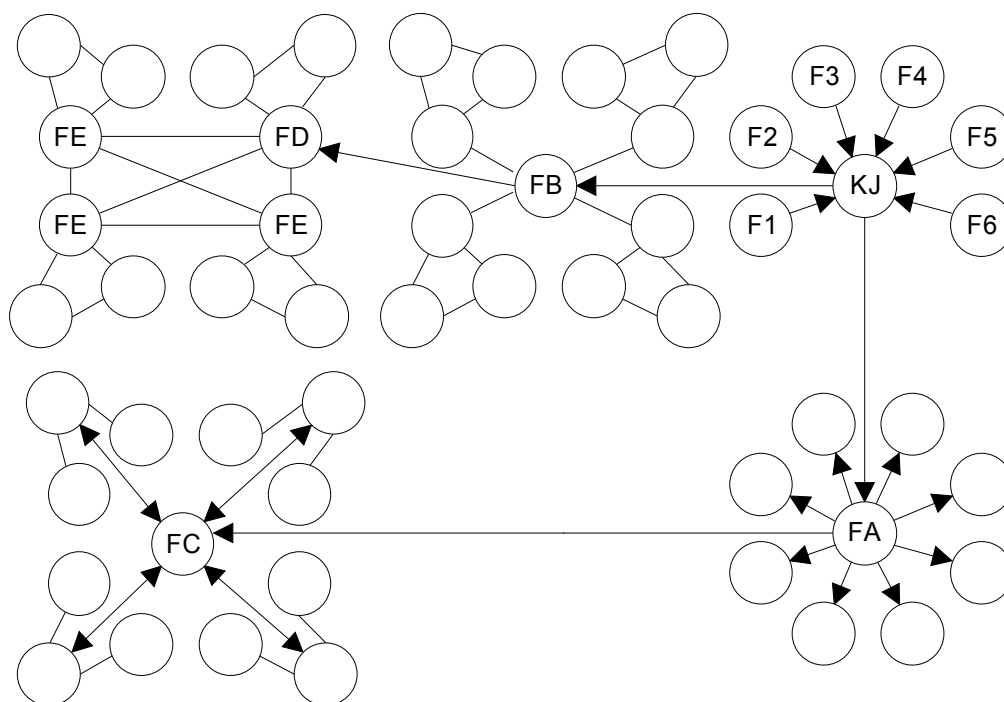
212
 213 **Opinion 9: The Commission could favor mainly open/free IDs and standards for open**

214 **educational resources.**

215

216 Favoring open solutions means, that it is easier to connect different systems with each other. In
217 reality, a specific system can cooperate with different system.

218



219

220

221 Like the figure above indicates, different systems use different standards and IDs, and the systems
222 are layered in different ways. In reality there are several versions of standards used for cooperation
223 of different systems. Like said in the consultation document, there are options for global
224 cooperation (e.g. UNESCO, ICDE and OECD); this cooperation can mean different IDs and
225 different standards.

226

227 **Opinion 10: The Commission has to accept, that a single global ID for open educational**
228 **resources needs large-scale cooperation and the realisation of one single global ID for**
229 **open educational resources means more large-scale cooperation.**

230

231 Naturally, it would be ideal situation, that one single global ID would be the reality. In the mean
232 time, the cooperative work for one single global ID should be serious part for standardising open
233 educational resources.

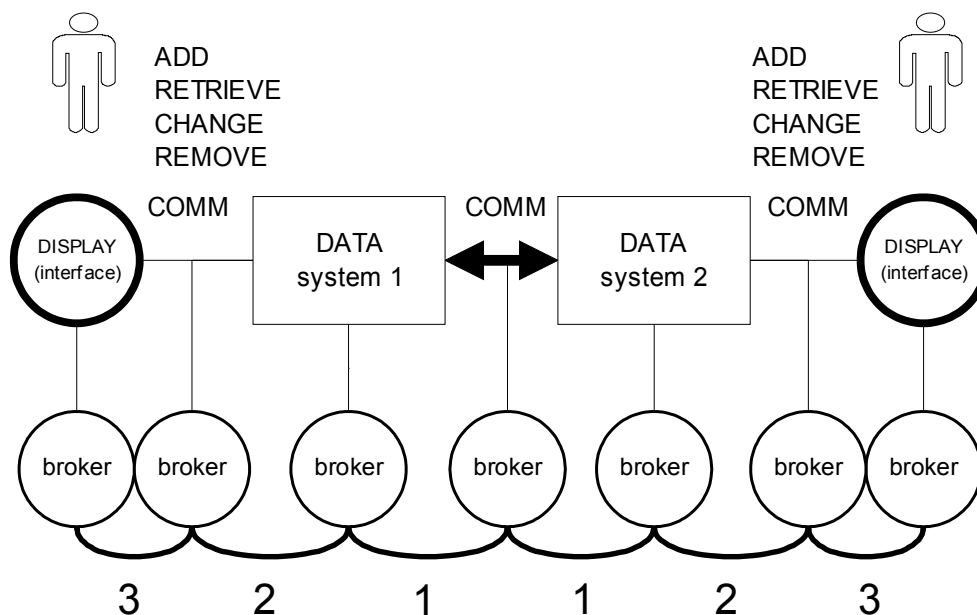
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235 **Need for different brokers (trusted third party)**

236

237 In practical reality, there is also need for trusted third parties in several computerised systems. An
238 example is online shopping, where there are trusted third parties for processing the monetary
239 transaction between customers and sellers.

240 It can be said, that using open educational resources means also some trusted third parties
 241 (Brokers). One example could be the certifications for open educational resources. There can be
 242 trusted third parties (Brokers), which can certify open educational resources.
 243
 244 One problem with opening educational resources is naturally the level/status for educational
 245 resources. Are the opened educational resources really top-quality resources?
 246



247
 248
 249 One problem is naturally the marketing of open educational resources, and the current situation is
 250 rather unstable, since there are so many providers for open educational resources. Therefore, there
 251 is a need for trusted third parties (Brokers) for cataloguing different open educational resources.
 252

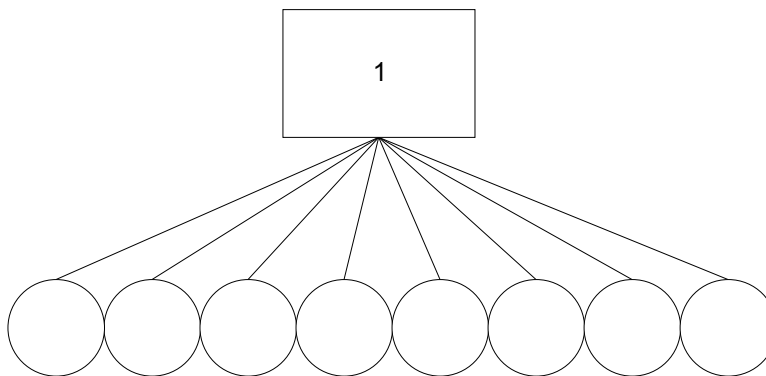
Opinion 11: The Commission has to gather information about all (needed) trusted third parties (Brokers), which are operating with open educational resources.

Opinion 12: Possibly using open educational resources effectively in the European Union level means establishing some trusted third parties (Brokers).

259 The general opinion can be, that the Commission has to really consider advantages and weaknesses
 260 for establishing new EU-wide trusted third parties (Brokers) for using open educational resources.
 261 Some of the trusted parties (Brokers) may be outside the European Union, and this adds one level of
 262 complexity for open educational resources.
 263

264 In the previous consultations I have explicated the need for standardised interfaces, which are result
 265 of different needed viewpoints. However, a large-scale information system can mean thousands of
 266 users, and naturally the data in a system can be voluminous. This is not a news item.
 267

268 Generally speaking, the usual way for a system is to create one interface to all users. However, I
269 propose creating several interfaces for different user groups. There can be numerous user groups,
270 and one interface for all does not work.
271



272
273
274 One solution can be standardisation efforts for different interfaces in several systems.

275
276 **Opinion 13: The Commission can specify rigorously and test rigorously different user**
277 **interfaces for open educational resources.**

278
279 **Opinion 14: The Commission can advocate standardised user interfaces in the**
280 **European Union level.**

281
282 Generally speaking, creating highly usable interfaces is not the norm in many cases; also the
283 problem multiplies when there is just one non-usable interface for a system. Therefore, creating,
284 testing and standardising several interfaces could be an option.

285
286
287 **Good luck !!!!!!!**

288
289 This Opinion is quite limited, and probably other opinions will result some constructive ideas.

290
291 Jukka S. Rannila
292 citizen of Finland
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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

- 339 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
340 http://www.jukkarannila.fi/lausunnot.html#nro_20
341
- 342 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
343 http://www.jukkarannila.fi/lausunnot.html#nro_21
344
- 345 EN: Opinion 23: Public consultation on the review of the European Standardisation System
346 http://www.jukkarannila.fi/lausunnot.html#nro_23
347
- 348 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
349 http://www.jukkarannila.fi/lausunnot.html#nro_27
350
- 351 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
352 http://www.jukkarannila.fi/lausunnot.html#nro_28
353
- 354 EN: Opinion 30: Internet Filtering
355 http://www.jukkarannila.fi/lausunnot.html#nro_30
356 NOTE: Organised by the European Committee for Standardization (CEN) ²
357
- 358 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
359 http://www.jukkarannila.fi/lausunnot.html#nro_32
360
- 361 EN: Opinion 34: REMIT Registration Format
362 http://www.jukkarannila.fi/lausunnot.html#nro_34
363 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ³
364
- 365 EN: Opinion 35: Exploiting the employment potential of the personal and household services
366 http://www.jukkarannila.fi/lausunnot.html#nro_35
367
- 368 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
369 http://www.jukkarannila.fi/lausunnot.html#nro_37
370
- 371 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
372 http://www.jukkarannila.fi/lausunnot.html#nro_39
373
- 374 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
375 http://www.jukkarannila.fi/lausunnot.html#nro_40
376
- 377 EN: Opinion 41: AT.39398: observations on the proposed commitments
378 http://www.jukkarannila.fi/lausunnot.html#nro_41
379

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

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

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390

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423



4 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.