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TO: [CNECT-NET-INNOVATION@ec.europa.eu](mailto:CNECT-NET-INNOVATION@ec.europa.eu)

Directorate General for Communications Networks, Content and Technology  
Unit E.3 “Net Innovation”  
European Commission  
B-1049 Brussels, Belgium

**Public opinion about Net Innovation for the Work Programme 2016-2017**

First of all, a lot of thanks to Directorate General for Communications Networks, Content and Technology (Unit E.3 “Net Innovation”) 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.

Directorate General for Communications Networks, Content and Technology can add the opinion documents to a relevant web page.

Annex 1 holds information about previous consultations.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila  
citizen of Finland

signed electronically

[Continues on the next page]

45

46 **Cooperation between different units of different Directorate-Generals**

47

48 Annex 1 contains information about different opinions, which I have provided for different units /  
49 Directorate-Generals.

50

51 A small note can be, that there might be a need for some cooperation between different units.  
52 Therefore, the titles of my opinions (Annex 1) could be assessed. Possibly different units /  
53 Directorate-Generals could assess my previous opinions carefully – also other opinions provided by  
54 different actors could be interesting.

55

56 **Amount of the background material / Limitations of this opinion**

57

58 Consultation <sup>1</sup> web page links to several documents (PDF) and several web pages. It can be noted,  
59 that this opinion is rather limited, and this opinion will assess **ONLY** some issues related Net  
60 Innovation for the Work Programme 2016-2017.

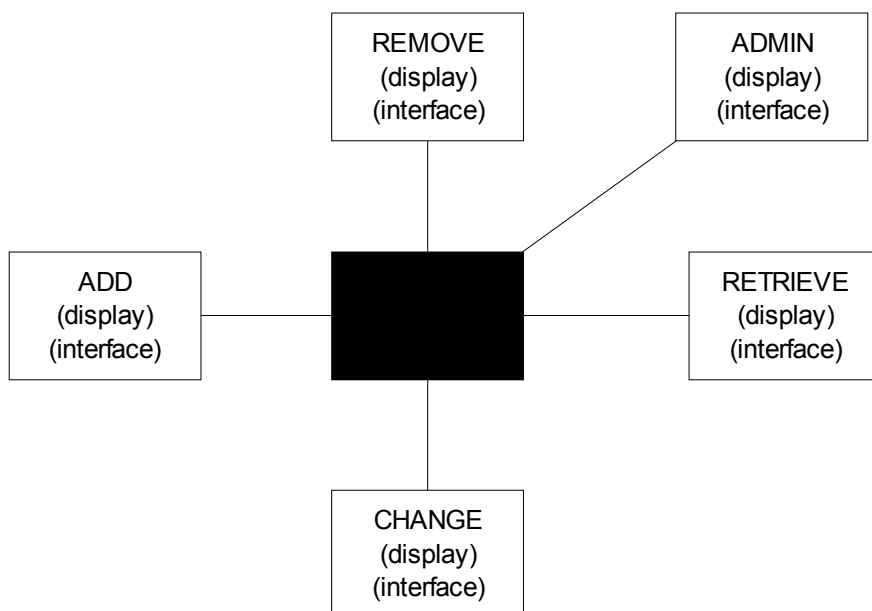
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62 **Some contributions from the previous consultations?**

63

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

67



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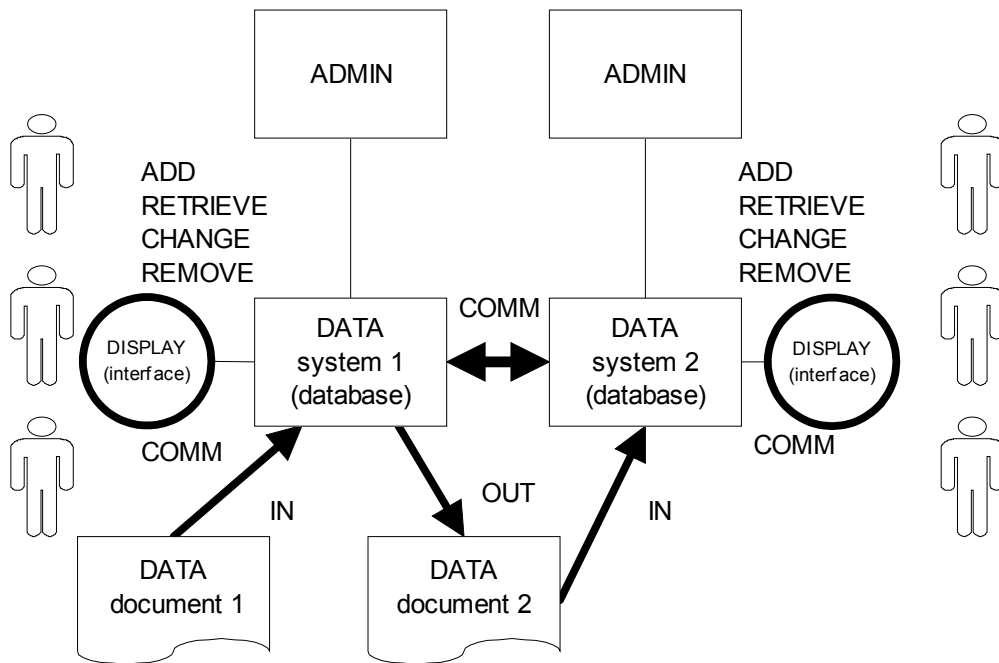
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70 In practical reality, we are quite ignorant about the implementation details of different information

<sup>1</sup> <https://ec.europa.eu/digital-agenda/en/news/public-survey-net-innovation-work-programme-2016-2017>, Public survey on Net Innovation for the Work Programme 2016-2017, the link worked on 22 September 2014

71 systems. Therefore, we can just use the “black box” without understanding the internal workings of  
 72 an information system.

73  
 74 During this consultation we are talking/writing about net innovations. In practical reality, different  
 75 information systems are interrelated, and practical added value is based on the seamless cooperation  
 76 between systems.  
 77



78  
 79  
 80 The previous figure gives us four basic functions: add, retrieve, change and remove. Then there are  
 81 databases and documents used in different systems. Users use different displays (interfaces).  
 82 Different systems need administration (also maintenance) for keeping a system functional. Then  
 83 there is communication (also standards) for direct and indirect usage of an information system.

84  
 85 Next table gives us some possibilities for assessing possibilities for open solutions and closed  
 86 solutions.  
 87

	<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>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>			

88

89

**Proposal: Net innovations can be classified to different classes – e.g. Device/Machinery, Operating system, Programs, Data/Conceptual models, Documents, Databases, Communications, Interfaces, Displays.**

90

91

92

93

**Proposal: Net innovations in different classes can be based on ownership, membership or agreements – these situations should be assessed carefully**

94

95

96

**Proposal: Net innovations in different classes can be open or closed – these situations should be assessed carefully**

97

98

99

In practical reality, different (digital) objects are used by different actors, and there can be several interlinked agreements, ownerships and memberships. When everything is working well different interlinked agreements, ownerships and memberships do not constitute any problems. However, different changes during the life-cycle of an information can be based on interlinked agreements, ownerships and memberships.

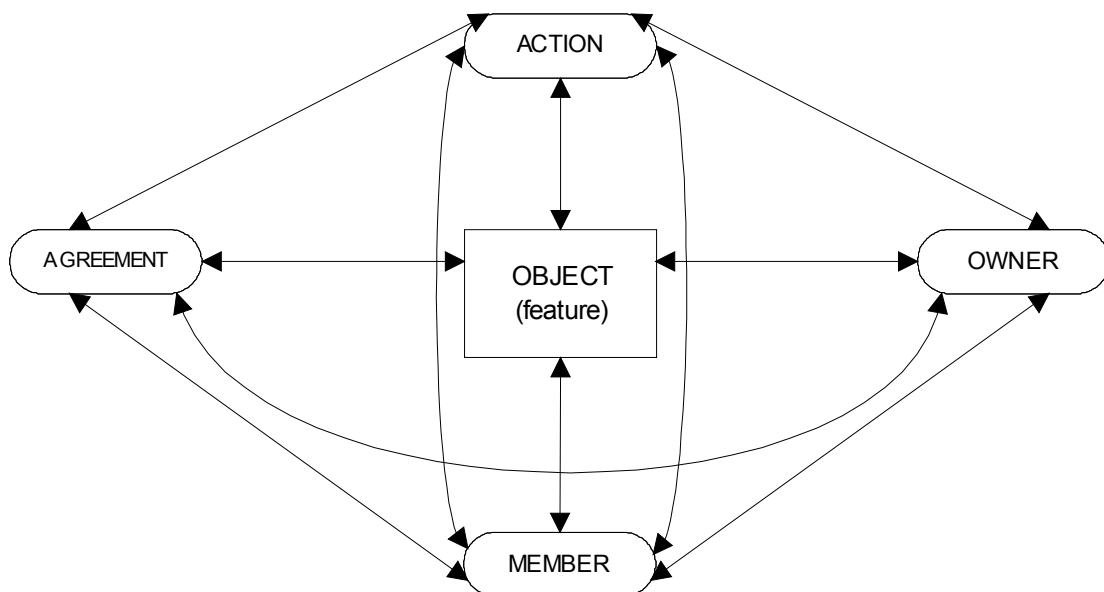
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105

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

107

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

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

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

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

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

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

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

115

116 In practical reality, there are always different situations with related agreements, ownerships and  
117 memberships. Also, different information systems can contain open and closed technological  
118 solutions, which adds one level of complexity for information system usage and development. Net  
119 innovations in different classes can be public sector information systems or private sector  
120 information systems.

121

122 **Proposal: Commission could assess different public sector information systems  
123 and private sector information systems in different application fields.**

124

125 **Proposal: Based on the assessment of different public sector information systems and  
126 private sector information systems there could be reasoned opinions to support  
127 development of public AND/OR sector information systems.**

128

129 With private sector information systems there is naturally the question of fair competition.

130 Therefore assessment of private sector information systems should contain information about the  
131 market situation in different application fields. Depending on the situation, there can be a role for  
132 supporting private development of private information systems – e.g. different standards could be  
133 enforced based on the assessment.

134

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

136

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

138

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

143

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

150

151 However, creating a new standard means actual both administrative and technical work, and in  
 152 some cases creating a new standard can last quite long. There are a lot of different standard setting  
 153 organisations (SDO), and one comprehensive list is provided <sup>2</sup> for us by ConsortiumInfo.org.

154

155 **Proposal: Commission could assess different standards in different application**  
 156 **fields.**

157

158 **Proposal: Based on the assessment of different standards, there could be reasoned**  
 159 **decisions to support development of some standards.**

160

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

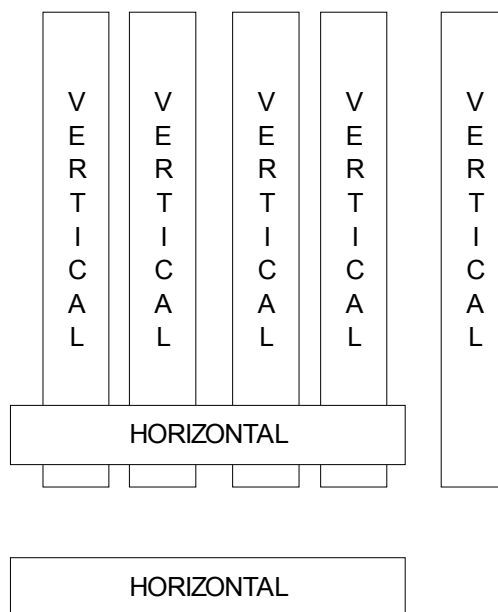
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163 One of the main themes can be division standards: horizontal standards and vertical standards. What  
 164 this means? Generally speaking, different ICT solutions will implement a large collection of  
 165 different standards: open standards and closed standards. In many cases, different ICT solutions do  
 166 not work together and this might not constitute a problem. However, in many cases different ICT  
 167 solutions has to work together seamlessly – possibly without further problems.

168

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

172



173

174

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

176

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

<sup>2</sup> <http://www.consortiuminfo.org/links/linksall.php>, Standard Setting Organizations and Standards List

178 **Proposal: There could be different standardisation efforts to horizontal standards and**  
179 **vertical standards.**

180  
181 **Favouring horizontal standards in standardisation efforts**

182  
183 **Proposal: Developing (and possible funding of development) horizontal standards**  
184 **should favoured in the development of new and/or revised standards.**

185  
186 Based on the previously mentioned problems, development of horizontal standards should be  
187 favoured. Depending on the situation, the European Commission could fund development of some  
188 horizontal standards.

189  
190 **Proposal: European Commission could assess different standards developing**  
191 **organisations (SDO).**

192  
193 **Proposal: Based on the assessment of different standards developing organisations**  
194 **(SDO), there could be actual funding for some standards developing organisations**  
195 **(SDO) – not to all.**

196  
197 **Opinion: The number of redundant standardisation efforts should be minimal.**

198  
199 **Supporting and/or developing different standard types?**

200  
201 When thinking net innovations, there are always possibilities for developing standards, which DO  
202 not gather large crowds of different stakeholders together. There can be “de facto” and “de jure”  
203 situations with different standards.

204  
205 Sometimes the “de facto” standards are hindrances for cooperation and/or competition – in previous  
206 consultations I gave some reasoned opinions about some “de facto” standards. Depending on  
207 situations, there is a need for actual cooperation between systems and sometimes there is a need for  
208 actual competition between systems.

209  
210 In some cases there is a clear anti-trust situation, and the European Commission has tried to  
211 mitigate different situations with standards.

212  
213 **Proposal: The European Commission should systematically evaluate systematically**  
214 **anti-trust situations with different standards.**

215  
216 **Problems with different identifiers (ID)**

217  
218 One perpetual problem is different identifiers (ID) related to different information systems. In the  
219 previous consultations different identifiers (ID) have been an issue for public consultations.

220  
221 **Proposal: The European Commission has to evaluate problems with different**  
222 **identifiers (ID) in different application fields**

223 Sometimes a “de facto” standard for identifier(s) (ID) has been problem. Some “de facto”  
224 identifier(s) are so widely used, that it can be considered as an industry standard, which means need  
225 for compliance with these (industry) standards. In some cases there is a clear anti-trust situation,  
226 and the European Commission has tried to mitigate different situations with identifier(s) (ID) .  
227

### 228 **More and more new identifiers (ID)**

229

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

- 234
- 235 \* global identifiers (ID)
- 236 \* EU-wide identifiers (ID)
- 237 \* general member state identifiers (ID)
- 238 \* several identifiers (ID) in a member state.
- 239

240 It can be noted, that some member states (EU) are federations, and different federal states can have  
241 their own identifiers (ID).  
242

243 More IDs is one of the consequences of digitalisation (of everything). The ID is identifier in an  
244 information system. Examples of these identifiers are following:

- 245
- 246 1) Facebook ID for an individual person
- 247 2) Facebook ID for the individual up-dates of individuals
- 248 3) Data Universal Numbering System (D-U-N-S)
- 249 4) Reuters instruments codes (RICs)
- 250 5) Social security code for individual citizens in the European Union member states
- 251 6) Business identity code for a company in an European Union member state
- 252 7) Value added tax code for a company in an European Union member state.
- 253

254 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),  
255 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand  
256 of using IDs from privately owned information systems.  
257

258 Social security codes and tax identifier codes are examples of publicly owned information system,  
259 and use of public identifiers have spread to several private systems. E.g. in Finland the social  
260 security code is so prevalent, that the private companies can possibly combine information from  
261 numerous private information systems. Naturally, these information combination efforts raise  
262 serious questions about the rules and regulations of combining information from private  
263 information systems.  
264

265 **Proposal: There could be a systematic project to collect relevant information of**  
266 **different identifiers (ID): e.g. global, EU-wide, regional and national.**  
267



268 When information about relevant identifiers is collected, there could be a serious assessment of  
269 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,  
270 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

271

272 **Proposal: The Commission could assess nature of different identifiers (ID).**

273

274 **Proposal: The Commission could start serious negotiations with some providers of**  
275 **identifiers (ID) (possible anti-trust situation?).**

276

277 An example of new identifiers (ID) is discussion about Internet of Things (IoT). When more and  
278 more devices are communicating with different (information) systems, there will be unavoidable  
279 situation of developing new identifiers (ID) for different devices (Internet of Things, IoT).

280

281 **Need for evaluating anti-trust situations related to different application fields**

282

283 Different companies have behaved differently when accused of anti-trust situation: some companies  
284 have selected legal proceedings with the Court of Justice of the European Union AND some  
285 companies have selected cooperation with the European Commission without legal proceeding.  
286 Some companies have lost their case based on decisions of the Court of Justice of the European  
287 Union, and they have been legally forced to comply with anti-trust demands of the European  
288 Commission.

289

290 **Proposal: The European Commission should evaluate systematically anti-trust**  
291 **situations in different application fields (of net innovations).**

292

293 At the moment we do not know all possible application fields of net innovations, and sometimes  
294 some solutions for different application fields gather large support in a short time-period. The  
295 fastness of the acceptance of a net innovation can surprise different stakeholders; sometimes some  
296 applications are accepted in a very short time-period and sometimes some applications are not  
297 accepted despite large-scale marketing efforts.

298

299 Based on this dilemma of fastness of the acceptance, there has to be very clear processes for  
300 different stakeholders for reporting anti-trust situations.

301

302 **Proposal: There should be very clear processes for different stakeholders for reporting**  
303 **anti-trust situations in different application fields (of net innovations).**

304

305 **Standardisation of interfaces for different stakeholders (companies, customers, citizen, etc.**  
306 **depending on the situation)**

307

308 In previous consultations I have advocated standardisation of interfaces in different application  
309 fields. The idea has been, that the standardised interfaces would not change from solution to  
310 solution, and therefore usage of different solutions could be easier. Also, with standardised  
311 interfaces the competition between solutions could be easier, since the users would not be forced to  
312 new interfaces, and technical experts could assess the technical details without being deceived by

313 non-standardised interfaces.

314

315 **Proposal: There could be an effort for modelling different processes in different**  
316 **application fields.**

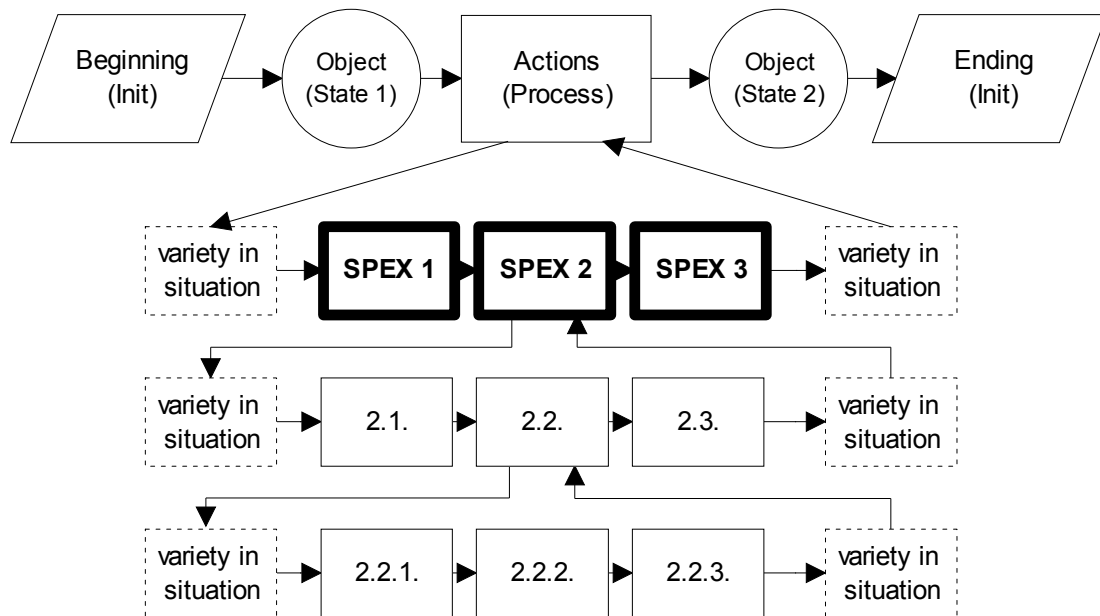
317

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

320

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

323

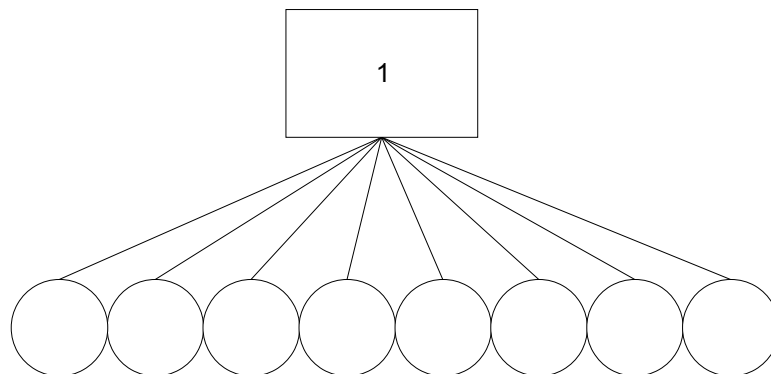


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325

326 It can be noted, that different actors can naturally have other non-standardised interfaces for  
327 different processes, and there is nothing wrong with that approach. Also, we have to assess the need  
328 for several interfaces. In other words, different stakeholder groups need different interfaces.

329



330

331 In the previous consultations documents I have explicated the need for standardisation of some  
332 interfaces. In practical reality, there can be different information technology applications for the  
333 same operations. It could be feasible to create different standardised interfaces, which can be  
334 implemented with different technologies.

335

336 **Proposal: There could be an effort for analysing the quality and the quantity of different**  
337 **interfaces for different stakeholder groups.**

338

339 **Proposal: European Commission could advocate standardised user interfaces in**  
340 **different levels.**

341

342 Naturally, there can be even tens of different user interfaces depending on the nature of different  
343 systems. The actual reality is very complex. In practical terms there are several situations:

344

- 345 \* systems must communicate directly with each other
- 346 \* there will be several communications methods for direct communication
- 347 \* there are different standards for direct communication
- 348 \* data in the system is added by processing different documents
- 349 \* data from the system is extracted and loaded to different documents
- 350 \* there are different standards for different documents
- 351 \* there will be several types for different documents
- 352 \* there are several displays / interfaces to system(s)
- 353 \* there are several user groups.

354

355 One solution can be standardisation efforts for different interfaces in several systems. The European  
356 Commission could work with global and regional partners for creating standardised user interfaces  
357 for different stakeholders. These standardised user interfaces could then be implemented by  
358 different information systems.

359

360 **Proposal: The Commission can support work, which rigorously develops and**  
361 **tests different interfaces for different purposes.**

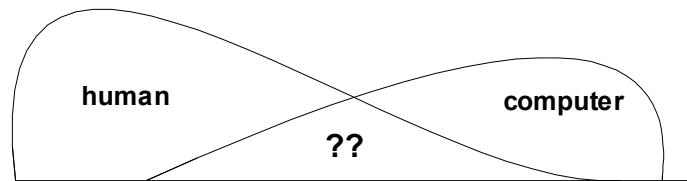
362

363 In reality there can be some applications (e.g. A, B, C) for the same operations, and there can be  
364 different providers for the same solutions. If every solution has a different interface, there can be a  
365 serious hindrance with the needed education for a new interface. When there are some standardised  
366 interfaces (SPEX), the efforts for learning of a new interface can be minimised.

367

368 One problem is developing interfaces, which are actually usable for different stakeholders. In some  
369 cases a computer system is superior when compared to human activities. In some cases humans are  
370 superior when compared to a computer system. The problem arises in a situation, where the same  
371 process can be done by a computer or by a person. If the interfaces are non-usable and demanding  
372 tens of (redundant/useless/confusing/needless/irrational/etc.) actions by stakeholders, the support  
373 for a system will vanish very quickly.

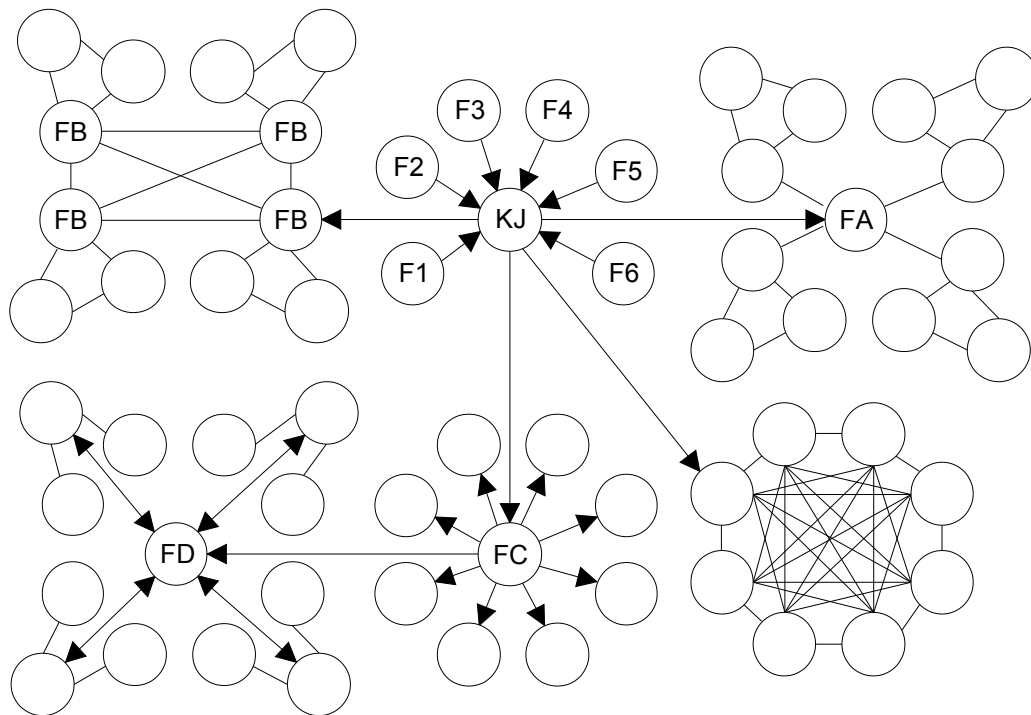
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**Proposal: The Commission can could support work, which will result very usable and very simple interfaces for different stakeholder groups – there could standardised interfaces, which could be implemented with different technologies.**

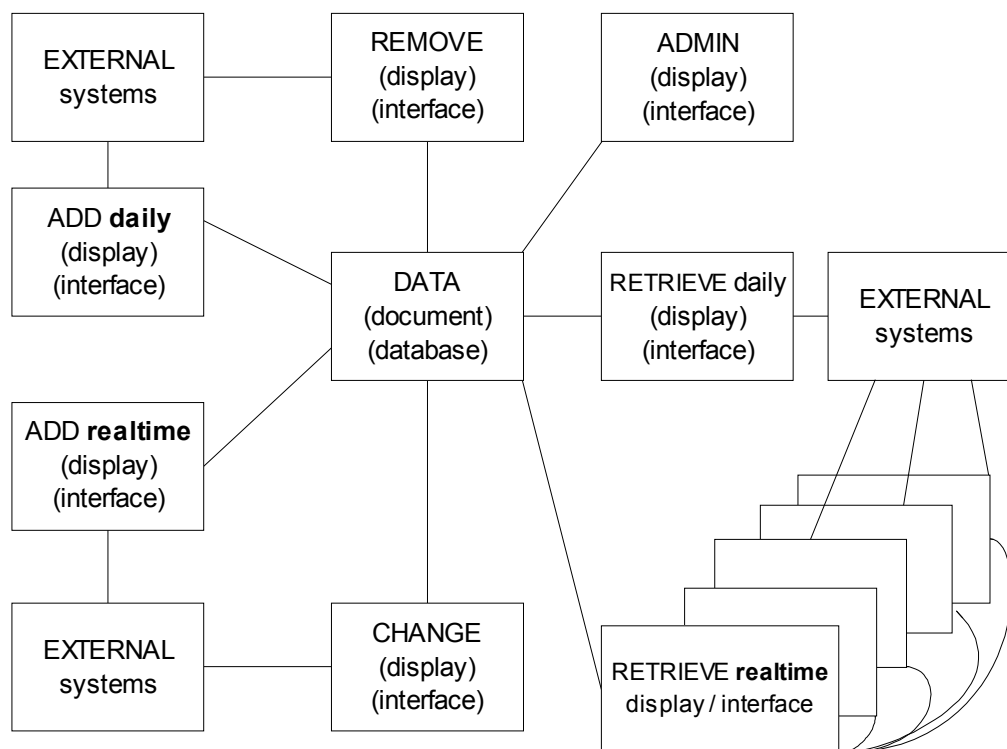
**Layered systems / Cloud systems**



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In some previous consultations I have presented the figure above. In practical reality, there are different systems, which use very different standards/formats for cooperation between different systems.

Like indicated in the previous figure, different informations systems are tightly integrated, and the feeds (e.g. formats F1-F6, FA, FB, FC, FC, FD) between systems can be non-standard or standardised. Generally speaking, there are numerous feeds provided by different information systems.



394  
395

396 It can be noted, that there can be different options for layered systems: realtime or other time-  
397 periods. Generally speaking, (realtime) retrieval is the most used function, and adding, changing  
398 and removing can have different time-periods.

399

400 **Proposal: The Commission can could support work, which assess situation with**  
401 **layered systems (also cloud systems).**

402

403 **Proposal: Based on the assessment layered systems (also cloud systems), there could**  
404 **support for work, which would reduce complexity of assessed layered systems.**

405

406 **Creating highly readable documents for different purposes**

407

408 In previous consultations I have advocated creation of highly readable documents – especially  
409 different legal documents. Legal texts in many cases can be presented with very readable text.

410

411 **Proposal: The Commission could support work, which would develop highly readable**  
412 **documents in different application fields (of net innovations) – e.g. licences, (standard)**  
413 **agreements, user documentation, technical references, etc.**

414

415 **Good luck !!!**

416

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

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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](http://www.jukkarannila.fi/lausunnot.html#nro_1)

EN: Opinion 2: Schools for the 21st Century

[http://www.jukkarannila.fi/lausunnot.html#nro\\_2](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](http://www.jukkarannila.fi/lausunnot.html#nro_3)

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

[http://www.jukkarannila.fi/lausunnot.html#nro\\_5](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](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_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 15: Collective Redress

[http://www.jukkarannila.fi/lausunnot.html#nro\\_15](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](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)

- 464 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
465 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
466
- 467 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
468 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
469
- 470 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
471 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
472
- 473 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
474 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
475
- 476 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
477 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
478
- 479 EN: Opinion 30: Internet Filtering  
480 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
481 NOTE: Organised by the European Committee for Standardization (CEN) <sup>3</sup>  
482
- 483 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
484 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
485
- 486 EN: Opinion 34: REMIT Registration Format  
487 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
488 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>4</sup>  
489
- 490 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
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548 [Continues on the next page]  
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**ANNEX 2**

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5 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.