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2 TO:

3 Units A1

4 Directorate-General for Competition

5 European Commission

6

7

8 **New Competition Tool ('NCT'), Ref. Ares(2020)2877634 - 04/06/2020**

9

10

11 First of all, a lot of thanks to Directorate-General for Competition for organising this important
12 consultation.

13

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

15

16 This opinion does not contain:

17 – any business secrets

18 – any trade secrets

19 – any confidential information.

20

21 This opinion is public.

22 PDF file of this opinion can be added to a relevant web page.

23

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

25 Annex 2 holds information about copyright, licence and disclaimers.

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28

29 Best Regards,

30

31

32

33 Jukka S. Rannila

34 citizen of Finland

35

36 signed electronically

37

38

39 [Continues on the next page]

40

41

42 About previous consultations / Repeating several issues

43

44 Annex 1 holds information about previous consultations. I have repeated the same issues several
45 times and previous consultation documents can be assessed critically. Different units of the
46 European Commission already know something about my previous opinions.

47

48 Highlighting only some issues

49

50 This opinion does not handle all issues which are mentioned on consultation documents. I have
51 presented different issues to different units of the European Commission. Generally speaking many
52 proposals are already implemented and therefore I don't present all possible issues based on this
53 consultation.

54

**55 Previous consultation: definition of relevant market for the purposes of Community
56 competition law**

57

58 Here we can note that this opinion has two parts.

59

60 **Part 1: Repeating certain issues once more**

61

Part 2: Some notices for new competition tool

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64 PART 1: REPEATING CERTAIN ISSUES ONCE MORE

65

66 Five basic functions for all information technology solutions

67

68 Generally speaking all information technology solutions have five basic functions:

69

70 • retrieve

71 • add

72 • change

73 • remove

74 • administration.

75

76 Generally speaking most used function is retrieving information from different systems.

77

78 Black box – Information technology solutions

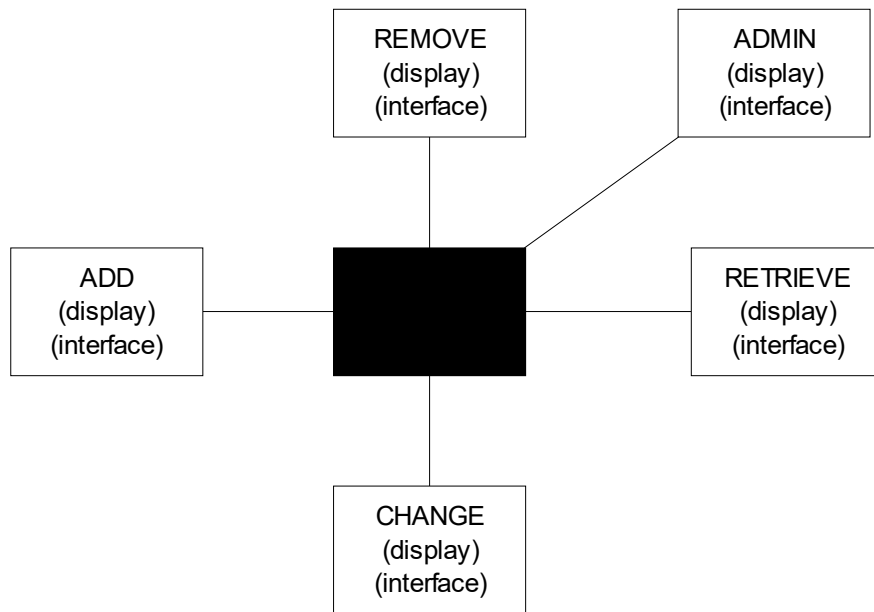
79

80 Usually we are using information systems without knowledge about internal functions – this can be
81 described as black box solution.

82

83 In many cases four basic functions (add, remove, change, retrieve) are working well without
84 problems (black box).

85



86
87

88 Here we can note that providers of different information technology can read data of some
89 information technology solutions. Providers of different information technology solutions can also
90 develop programs and machinery.

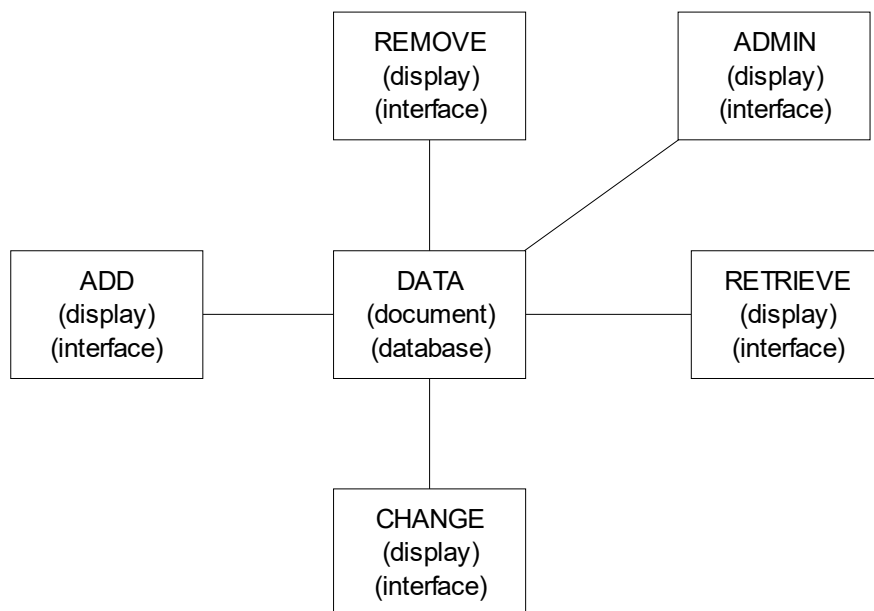
91

92 **White box – Information technology solutions**

93

94 In some cases (open of free software) information about programs and machinery can be accessed
95 by several stakeholders – i.e. white box.

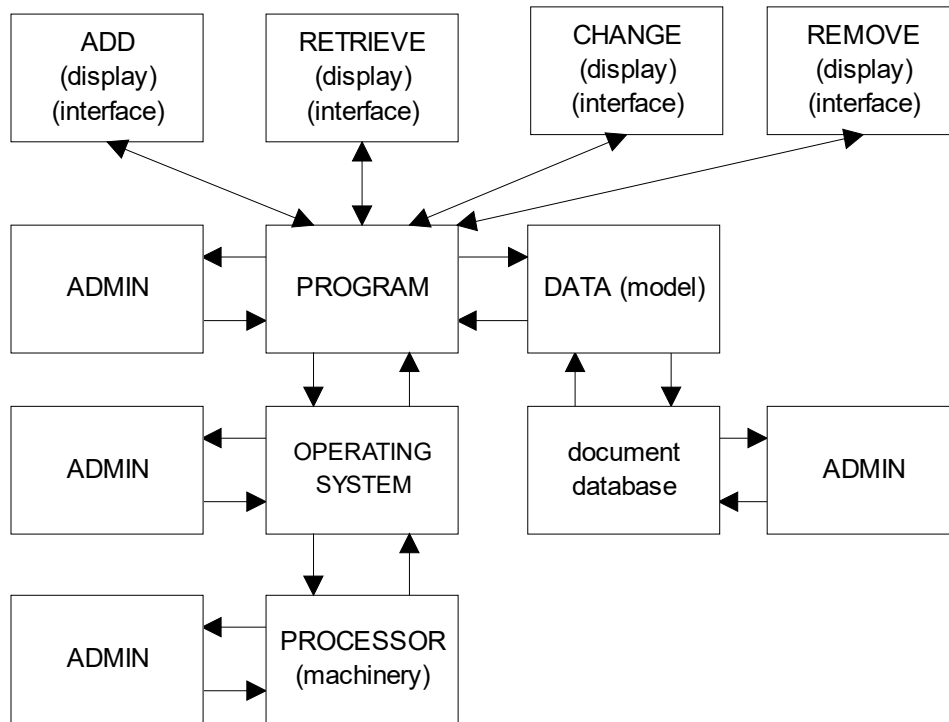
96



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98 **Adding more details for information technology solutions**

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101

102 All information technology solutions have also processor(s) (machinery), operating system(s) and
 103 program(s). Processor(s) (machinery), operating system(s) and program(s) all need administration
 104 for keeping a system up-to-date. All programs handle data in some format and data can be
 105 database(s) and/or document(s).

106

107 **Owner, member, agreement, standards, openness and closeness**

108

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

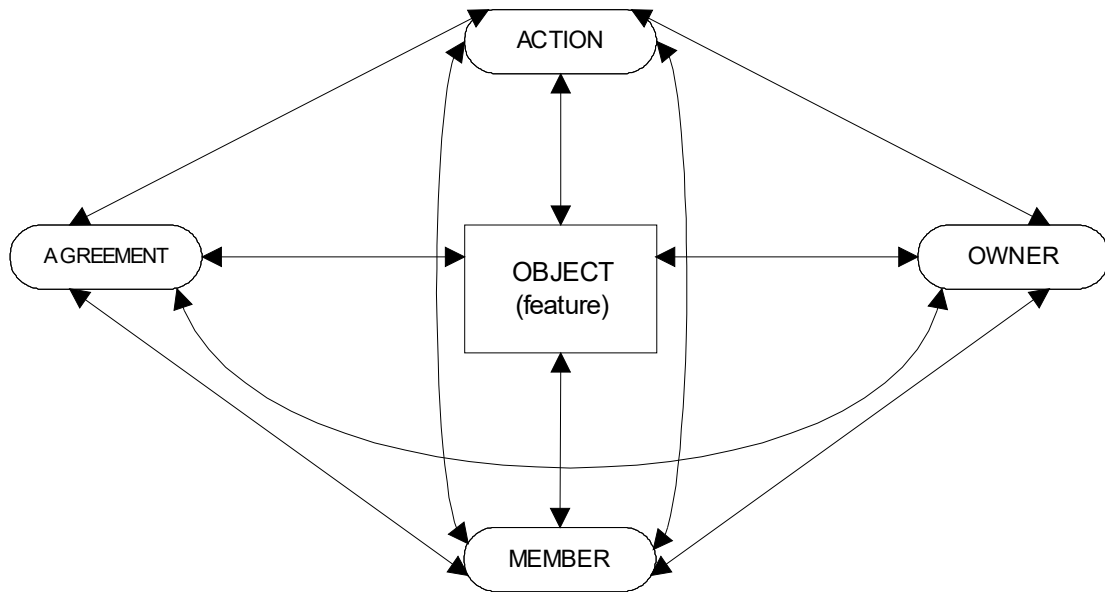
113

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

118

119 All previously mentioned issues can be based on ownership, membership and agreements. There
 120 can be also different standards, which can be open or closed.

121



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

Based on previous presentations it is possible to present following table.

	Owner? Member? Agreement?	Standards?	OPEN	CLOSED
1. Device / Machinery				
2. Operating system				
3. Program(s)				
4. Data models / Conceptual models				
5. Documents				
6. Databases				
7. Communications				
8. Retrieve / Interface / Display				
9. Add / Interface / Display				
10. Remove / Interface / Display				
11. Change / Interface / Display				

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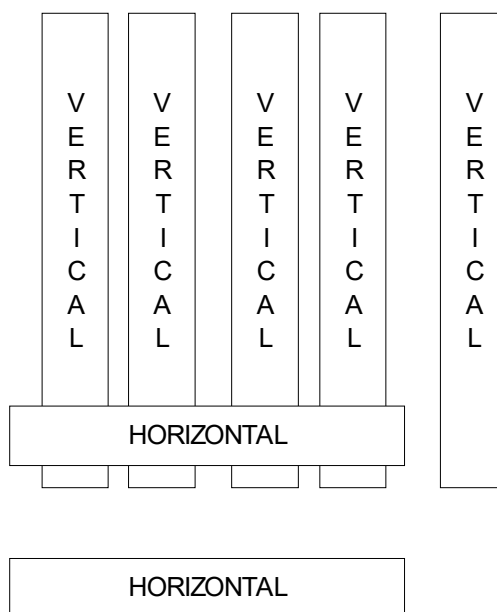
130

131 **PART 2: SOME NOTICES FOR NEW COMPETITION TOOL**

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133 **Standards / horizontal and vertical standards**

134



135

136

137 There are differences between horizontal and vertical standards. A simple example is naturally
 138 email solutions. There are several vertical standards when creating technically email solutions. Then
 139 there are horizontal standards which enable sending messages between technically different email
 140 solutions.

141

142 Horizontal standards enables technological solutions which can work together. Horizontal standards
 143 hides different complexities in information systems.

144

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

146

147 Personally I have advocated using different horizontal standards.

148

149 Here we can note some problems:

150

- 151 • some systems are based on **de-facto** standards
- 152 • some systems are based on **de-jure** standards
- 153 • there can be confrontations between **de-facto** and **de-jure** standards
- 154 • there can be a monopoly situation in some domain
- 155 • some standards may inhibit possible actions of some stakeholders
- 156 • there can be a standard war on some domains
- 157 • standards have different life-cycles

- 158 • systems have different life-cycles
- 159 • there can be mismatches between different life-cycles
- 160 • there can be failed standards
- 161 • there can be deprecated standards.

162

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

167

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

174

175 **Proposal: New competition tool could assess (1) vertical information technology**
176 **solutions.**

177

178 **Proposal: New competition tool could assess (2) horizontal information technology**
179 **solutions.**

180

181 Depending on the situation on different application fields there can be both vertical information
182 technology solutions and horizontal information technology solutions.

183

184 **Proposal: New competition tool could assess (3) vertical standards.**

185

186 **Proposal: New competition tool could assess (4) horizontal standards.**

187

188 Depending on the situation on different application fields there can be both vertical standards and
189 horizontal standards.

190

191 **Proposal: New competition could assess especially the situation with (2) horizontal**
192 **information technology solutions and (4) horizontal standards.**

193

194 **Enforcing horizontal standards based on decisions by different competition authorities**

195

196 One issue is enforcing horizontal standards based on decisions by different competition authorities
197 like Directorate-General for Competition (European Commission).

198

199 **Proposal: In some cases different competition authorities could enforce usage of**
200 **horizontal standards.**

201

202 **Enforcing open horizontal standards based on decisions by different competition authorities**

203

204 One issue is enforcing *open horizontal* standards based on decisions by different competition
 205 authorities like Directorate-General for Competition (European Commission).

206

207 **Proposal: In some cases different competition authorities could enforce usage of *open***
 208 ***horizontal* standards.**

209

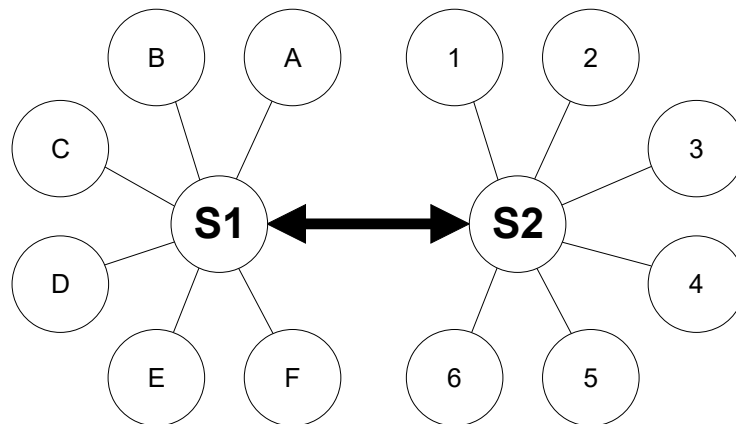
210 Cooperation between different (mostly vertical) systems

211

212 In reality cooperation between different information system is crucial. Different systems (S1 ↔ S2)
 213 can comply with different standards (e.g. A-F, 1-6). Cooperation between systems (S1 ↔ S2) can be
 214 based on different standards.

215

1-2



216

217

218 Like mentioned before there can be several standards (closed/open/horizontal/vertical) for the same
 219 functions in different information systems.

220

221 As a summary it can be noted that especially *horizontal* and *open horizontal* standards are
 222 important for effective competition between different (mostly vertical) solutions.

223

224

225 **Good luck!!!**

226

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

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231 [Continues on the next page]

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission. General page to all consultations – both in English and in Finnish:

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

My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission.

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

- 277 EN: Opinion 19: Official Acknowledgement by the Commission
278 http://www.jukkarannila.fi/lausunnot.html#nro_19
279
- 280 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
281 http://www.jukkarannila.fi/lausunnot.html#nro_20
282
- 283 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
284 http://www.jukkarannila.fi/lausunnot.html#nro_21
285
- 286 EN: Opinion 23: Public consultation on the review of the European Standardisation System
287 http://www.jukkarannila.fi/lausunnot.html#nro_23
288
- 289 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
290 http://www.jukkarannila.fi/lausunnot.html#nro_27
291
- 292 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
293 http://www.jukkarannila.fi/lausunnot.html#nro_28
294
- 295 EN: Opinion 30: Internet Filtering
296 http://www.jukkarannila.fi/lausunnot.html#nro_30
297 NOTE: Organised by the European Committee for Standardization (CEN) ¹
298
- 299 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
300 http://www.jukkarannila.fi/lausunnot.html#nro_32
301
- 302 EN: Opinion 34: REMIT Registration Format
303 http://www.jukkarannila.fi/lausunnot.html#nro_34
304 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
305
- 306 EN: Opinion 35: Exploiting the employment potential of the personal and household services
307 http://www.jukkarannila.fi/lausunnot.html#nro_35
308
- 309 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
310 http://www.jukkarannila.fi/lausunnot.html#nro_37
311
- 312 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
313 http://www.jukkarannila.fi/lausunnot.html#nro_39
314
- 315 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
316 http://www.jukkarannila.fi/lausunnot.html#nro_40
317
- 318 EN: Opinion 41: AT.39398: observations on the proposed commitments
319 http://www.jukkarannila.fi/lausunnot.html#nro_41

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

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

- 320
321 EN: Opinion 42: Opening up Education
322 http://www.jukkarannila.fi/lausunnot.html#nro_42
323
324 EN: Opinion 43: Publication of extracts of the European register of market participants
325 http://www.jukkarannila.fi/lausunnot.html#nro_43
326 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
327
328 EN: Opinion 44: Evaluation policy guidelines
329 http://www.jukkarannila.fi/lausunnot.html#nro_44
330
331 EN: Opinion 45: About ICT standardisation
332 http://www.jukkarannila.fi/lausunnot.html#nro_45
333
334 EN: Opinion 46: Review of the EU copyright rules
335 http://www.jukkarannila.fi/lausunnot.html#nro_46
336
337 EN: Opinion 51: European Area of Skills and Qualifications
338 http://www.jukkarannila.fi/lausunnot.html#nro_51
339
340 EN: Opinion 52: Trusted Cloud Europe Survey
341 http://www.jukkarannila.fi/lausunnot.html#nro_52
342
343 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
344 http://www.jukkarannila.fi/lausunnot.html#nro_53
345 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
346
347 EN: Opinion 55: European Energy Regulation
348 http://www.jukkarannila.fi/lausunnot.html#nro_55
349 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
350
351 EN: Opinion 59: Green paper on mobile Health
352 http://www.jukkarannila.fi/lausunnot.html#nro_59
353
354 EN: Opinion 60: Cross-border inheritance tax problems within the EU
355 http://www.jukkarannila.fi/lausunnot.html#nro_60
356
357 EN: Opinion 61: European Register of Products Containing Nanomaterials
358 http://www.jukkarannila.fi/lausunnot.html#nro_61
359
360 EN: Opinion 64: Corporate Social Responsibility - European Commission
361 http://www.jukkarannila.fi/lausunnot.html#nro_64
362
363 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
364 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 365 EN: Opinion 68: European Network Code Stakeholder Committees
366 http://www.jukkarannila.fi/lausunnot.html#nro_68
367 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
368
369 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
370 http://www.jukkarannila.fi/lausunnot.html#nro_71
371 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
372
373 EN: Opinion 74: Enabling the Internet of Things
374 http://www.jukkarannila.fi/lausunnot.html#nro_74
375 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ³
376
377 EN: Opinion 80: Mandatory Transparency Register
378 http://www.jukkarannila.fi/lausunnot.html#nro_80
379
380 EN: Opinion 84: Revision of the European Interoperability Framework
381 http://www.jukkarannila.fi/lausunnot.html#nro_84
382
383 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
384 http://www.jukkarannila.fi/lausunnot.html#nro_86
385
386 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
387 http://www.jukkarannila.fi/lausunnot.html#nro_88
388
389 EN: Opinion 89: BEREC Guidelines for net neutrality rules
390 http://www.jukkarannila.fi/lausunnot.html#nro_89
391 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
392
393 EN: Opinion 93: Safety of apps and other non-embedded software
394 http://www.jukkarannila.fi/lausunnot.html#nro_93
395
396 EN: Opinion 95: Targeted consultation on eForms
397 http://www.jukkarannila.fi/lausunnot.html#nro_95
398
399 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
400 http://www.jukkarannila.fi/lausunnot.html#nro_97
401
402 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
403 http://www.jukkarannila.fi/lausunnot.html#nro_98
404
405 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
406 Regulators. Recast
407 http://www.jukkarannila.fi/lausunnot.html#nro_99
408

³ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 409 EN: Opinion 100: Protection of personal data (EU)
410 http://www.jukkarannila.fi/lausunnot.html#nro_100
411
- 412 EN: Opinion 101: Governance of the Energy Union
413 http://www.jukkarannila.fi/lausunnot.html#nro_101
414
- 415 EN: Opinion 102: Smart Wearables
416 http://www.jukkarannila.fi/lausunnot.html#nro_102
417
- 418 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
419 (ENISA)
420 http://www.jukkarannila.fi/lausunnot.html#nro_106
421
- 422 EN: Opinion 108: Single Digital Gateway
423 http://www.jukkarannila.fi/lausunnot.html#nro_108
424
- 425 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
426 http://www.jukkarannila.fi/lausunnot.html#nro_110
427
- 428 EN: Opinion 111: Interoperability of information systems for migration and security
429 http://www.jukkarannila.fi/lausunnot.html#nro_111
430
- 431 EN: Opinion 113: Transform of health and care
432 http://www.jukkarannila.fi/lausunnot.html#nro_113
433
- 434 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
435 Internet
436 http://www.jukkarannila.fi/lausunnot.html#nro_114
437 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
438
- 439 EN: Opinion 118: Fake news and online disinformation
440 http://www.jukkarannila.fi/lausunnot.html#nro_118
441
- 442 EN: Opinion 119: European Social Security Number
443 http://www.jukkarannila.fi/lausunnot.html#nro_119
444
- 445 EN: Opinion 120: European Labour Authority
446 http://www.jukkarannila.fi/lausunnot.html#nro_120
447
- 448 EN: Opinion 121: 2nd Data Package
449 http://www.jukkarannila.fi/lausunnot.html#nro_121
450
- 451 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
452 Cybersecurity Research and Competence Centre
453 http://www.jukkarannila.fi/lausunnot.html#nro_122

- 454
455 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
456 THE COUNCIL on the re-use of public sector information (recast)
457 http://www.jukkarannila.fi/lausunnot.html#nro_123
458
459 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
460 http://www.jukkarannila.fi/lausunnot.html#nro_125
461
462 EN: Opinion 128: Summertime arrangements
463 http://www.jukkarannila.fi/lausunnot.html#nro_128
464
465 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
466 http://www.jukkarannila.fi/lausunnot.html#nro_129
467
468 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
469 http://www.jukkarannila.fi/lausunnot.html#nro_132
470
471 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
472 ("eForms")
473 http://www.jukkarannila.fi/lausunnot.html#nro_133
474
475 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
476 UCC
477 http://www.jukkarannila.fi/lausunnot.html#nro_134
478
479 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
480 http://www.jukkarannila.fi/lausunnot.html#nro_139
481
482 EN: Opinion 141: Farm Accountancy Data Network
483 http://www.jukkarannila.fi/lausunnot.html#nro_141
484
485 EN: Opinion 142: Horizon Europe (two consultations)
486 http://www.jukkarannila.fi/lausunnot.html#nro_142
487
488 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
489 (evaluation)
490 http://www.jukkarannila.fi/lausunnot.html#nro_144
491
492 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
493 http://www.jukkarannila.fi/lausunnot.html#nro_146
494 NOTE: Organised by the European Committee for Standardization (CEN)
495
496 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
497 http://www.jukkarannila.fi/lausunnot.html#nro_147
498

499 EN: Opinion 152: Revision of the Non-Financial Reporting Directive

500 http://www.jukkarannila.fi/lausunnot.html#nro_152

501

502 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation

503 http://www.jukkarannila.fi/lausunnot.html#nro_154

504

505 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year

506 2021

507 http://www.jukkarannila.fi/lausunnot.html#nro_156

508

509 EN: Opinion 159: EU competition law - market definition notice (evaluation)

510 http://www.jukkarannila.fi/lausunnot.html#nro_159

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515 My opinions to the previous and relevant consultations – there consultations were mostly organised

516 by the European Commission. General page to all consultations – both in English and in Finnish:

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

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521 [Continues on the next page]

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ANNEX 2

525 DISCLAIMERS

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538

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