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TO:
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Reference: NZBN Primary Business Data change proposals
Reference: Discussion Document NZBN – Primary Business Data change proposals

First of all, a lot of thanks to Ministry of Business Innovation and Employment (New Zealand) 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
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– any confidential information.

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

Annex 1 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

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46

47 **Previous New Zealand consultations**

48

49 I have presented previous opinions based on New Zealand consultations.

50

51 EN: Opinion 70: Providing better APIs in New Zealand

52 http://www.jukkarannila.fi/lausunnot.html#nro_70

53

54 EN: Opinion 73: Financial / Conceptual Frameworks

55 http://www.jukkarannila.fi/lausunnot.html#nro_73

56

57 EN: Opinion 81: Records and Information Management Standard

58 http://www.jukkarannila.fi/lausunnot.html#nro_81

59

60 EN: Opinion 112: Data and data exchanges for market transactions

61 http://www.jukkarannila.fi/lausunnot.html#nro_112

62

63 Interested person could read those opinions. Some issues are relevant for this consultation.

64

65 **European Union context / different identifiers (ID)**

66

67 European Union institutions has organised different consultations on several issues.

68

69 I have highlighted many times need for different identifiers (ID) based on previous consultations.

70

71 **Finnish context / Business ID (Business Identity Code)**

72

73 Business ID

74 <https://www.ytj.fi/en/index/businessid.html>

75

76 What is BIS? (Business Information System BIS ("YTJ" in Finnish))

77 <https://www.ytj.fi/en/index/whatisbis.html>

78

79 In Finland we consolidated two previous registers and now there is only one identifier (Business ID
80 – Business Identity Code).

81

82 **Proposal: There could be some assessments in New Zealand for consolidating different**
83 **identifiers (ID).**

84

85 **Historical information / Two proposals**

86

87 I propose following issues based on the discussion document:

88

89 **(new) Proposal 1.9: Historical information**90 **(new) Proposal 3.6: Historical information**

91
92 In Finland we have possibilities to add historical information to Business Information System
93 (BIS).
94

95 There could be some issues for historical information:

- 96
- 97 – status changes
- 98 – name changes
- 99 – mergers of different entities (naturally mostly companies).

100
101 There could be other relevant issues when assessing historical information.
102

103 **More and more new identifiers (ID)**

104
105 In previous consultations there has been discussion about different identifiers (ID) in different
106 information systems. It can be noted from the previous opinions that there will be several and
107 different identifiers (ID) for different levels.
108

109 **Proposal: There could be a systematic review of different identifiers (ID) at different**
110 **levels.**

111
112 **Proposal: Possible systematic review of different identifiers (ID) should assess different**
113 **situations.**

114
115 Different information systems have also internal identifiers (ID) and external identifiers (ID) for
116 (possible) public usage. The added value for different stakeholders is provided by combination of
117 different identifiers (ID) in a specific information system.
118

119 **Proposal: There could be some assessment(s) based on different versions of different**
120 **identifiers (ID).**

121
122 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
123 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
124 (ID), but this consolidation means some serious technical and administrative actions.
125

126 **Proposal: Legacy identifiers (ID) could be assessed seriously.**
127

128 When information about relevant identifiers is collected, there could be a serious assessment of
129 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
130 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.
131

132 **Proposal: The nature of different identifiers (ID) could be assessed.**
133

134 **Proposal: There could be serious negotiations with some providers of identifiers (ID).**
135

136 In the European Union there has been different anti-trust cases which are related to different private
 137 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
 138 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

139
 140 **Added value of different identifiers (ID)?**
 141

142 Here we can note possible cooperation between different systems and usually cooperation between
 143 different systems means using different identifiers (ID). There can be some central (S1 ↔ S2)
 144 systems which collect information from other systems which have own identifiers (ID).

145
 146 In previous consultations there has been discussion about different identifiers (ID) in different
 147 information systems. It can be noted from the previous opinions that there will be several and
 148 different identifiers (ID) for different levels. There can be several identifiers (ID), e.g. following:

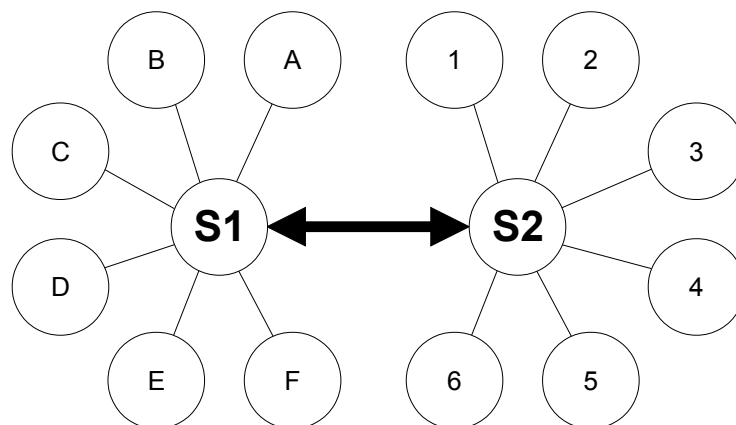
149
 150 Examples of these identifiers (ID) are following:

- 151
- 152 1) Facebook ID for an individual person
- 153 2) Facebook ID for the individual up-dates of individuals
- 154 3) Data Universal Numbering System (D-U-N-S)
- 155 4) Reuters instruments codes (RICs)
- 156 5) Social security code for individual citizens in the European Union member states
- 157 6) Business identity code for a company in an European Union member state
- 158 7) Value added tax code for a company in an European Union member state.
- 159

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

163

1-2



164
 165
 166

Note: Digitalisation of everything means more identifiers (ID).

167

168

Note: All new identifiers (ID) mean more work for developing existing and new informations systems.

169

170

171

Note: There can be new stakeholder groups in the near/distant future which mean more identifiers (ID).

172

173

174

Proposal: There could be some assessment(s) based on different versions of different identifiers (ID).

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177

General web page based on different consultations

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179

General web page for my opinions is following: <http://www.jukkarannila.fi/lausunnot.html>

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Good luck!!!

185

186

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

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