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TO: HealthConsult (Australia)

Development of a Framework for Secondary Use of My Health Record Data

First of all, a lot of thanks to Department of Health (Australian Government) and HealthConsult 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.

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

Annex 1 holds information about previous Australian consultations

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

37

38 **Previous opinions – many opinions related to information technology**

39

40 General page for my previous opinions is following:

41 www.jukkarannila.fi/lausunnot.html

42

43 **Previous Australian consultations**

44

45 I have written several opinions based on previous Australian consultations.

46

47 **Annex 1** contains information about previous Australian consultations and my previous opinions.

48

49 I have repeated the same issues several times based on previous consultations.

50

51 **Just one issue based on this consultation / Open horizontal standards**

52

53 This is opinion is about different standards and especially about open horizontal standards.

54

55 **About different standards**

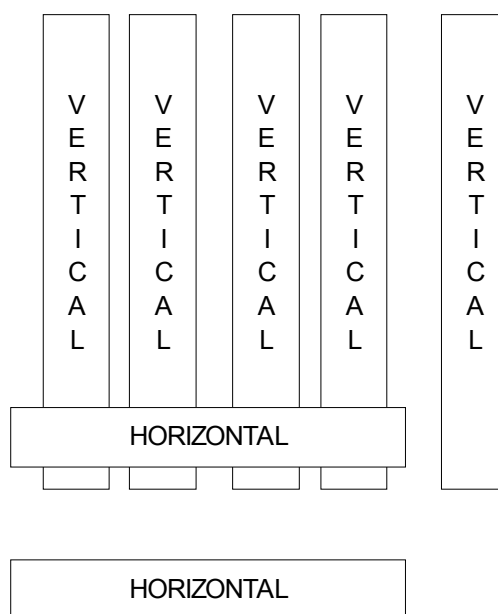
56

57 I have proposed several times to use open horizontal standards when developing different information system.

58

60 **Favouring open standards / Favouring horizontal standards**

61



62

63

64 There are differences between horizontal and vertical standards. A simple example is naturally

65 email solutions. There are several vertical standards when creating technically email solutions. Then
66 there are horizontal standards which enable sending messages between technically different email
67 solutions.

68
69 **Proposal: There could be assessment of vertical and horizontal standards.**

70
71 **Proposal: Using horizontal standards could be favoured when creating different**
72 **information systems.**

73
74 Horizontal standards enables technological solutions which can work together. Horizontal standards
75 hides different complexities in information systems.

76
77 **Opinion: The number of redundant standardisation efforts should be minimal.**

78
79 **Proposal: There could be separation of horizontal standards and vertical standards.**

80
81 **Proposal: There could be different standardisation efforts to horizontal standards and**
82 **vertical standards.**

83
84 Personally I have advocated using different horizontal standards. For example email standards
85 (horizontal) are implemented with very different technologies (vertical).

86
87 Here we can note some problems:

- 88
- 89 • some systems are based on **de-facto** standards
 - 90 • some systems are based on **de-jure** standards
 - 91 • there can be confrontations between **de-facto** and **de-jure** standards
 - 92 • there can be a monopoly situation in some domain
 - 93 • some standards may inhibit possible actions of some stakeholders
 - 94 • there can be a standard war on some domains
 - 95 • standards have different life-cycles
 - 96 • systems have different life-cycles
 - 97 • there can be mismatches between different life-cycles
 - 98 • there can be failed standards
 - 99 • there can be deprecated standards.

100
101 It is quite normal situation in the information technology field that there are competing standards
102 for some application field. Therefore there are all the time ongoing “standards wars” or “format
103 wars”. The information technology standards tend to be interrelated and one “standards war” or
104 “format war” can lead to another similar situation.

105
106 I have advocated open standards even though in some cases open standards are not de facto
107 standards. In practice public sector has very important role, when some standards are competing in
108 the market place. Because public sector has a considerable power when buying/developing
109 information systems and therefore public sector can sometimes direct markets to certain standards.

110 Therefore there should be serious vigilance when assessing different standards and “standards” in
111 some application fields.

112

113 There are different standards setting organisations on the information technology field. One list ¹ of
114 these standards setting organisations is provided by ConsortiumInfo.org.

115

116 One warning can be said about standards setting organisations. All standards setting organisations
117 are not successes based on several factors and there can may irrelevant standards setting
118 organisations. Market situation on different markets varies a lot based on different factors.

119

120 **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**
121 **different standard setting organisations could be assessed carefully.**

122

123 Personally I have advocated using different horizontal standards. For example email standards
124 (horizontal) are implemented with very different technologies (vertical).

125

126 **Proposal: Governments should especially concentrate on horizontal standards.**

127

128 **Proposal: Some government agencies could apply for memberships of different**
129 **standard setting organisations which develop especially horizontal standards.**

130

131 **Proposal: Government agencies should not be passive by-standers when different**
132 **horizontal standards are developed.**

133

134 **Proposal: Government agencies could financially support development of horizontal**
135 **standards.**

136

137 **Proposal: There could some guidance for using open horizontal standards on different**
138 **application fields.**

139

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

141



142

143

144 I have advocated usage of web feeds on several previous opinion documents. Actually there are two
145 standards for web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

146

1 Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php
2 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification
3 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS
4 [https://en.wikipedia.org/wiki/Atom_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)
5 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format
6 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

147 **Proposal: Web feeds could be advocated when developing different informations**
148 **systems.**

149
150 **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
151 **time) information for different stakeholder(s) (communities).**

152
153 **Proposal: There can be different web feeds (RSS and/or Atom) for different**
154 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
155 **solution.**

156
157 **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

158
159 It can be easier to create web feeds in different information systems since web feeds enable
160 connections without direct system-to-system connections.

161
162 It can be noted, that different back-office systems (with a wide variety of different technologies) can
163 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
164 kind solutions front-office systems don't need direct system-to-system communications with back-
165 office systems.

166
167
168
169 **Good luck!!!**

170
171 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
172 opinions. This remains to be seen.

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175 [Continues on the next page]

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ANNEX 1

General page for my previous opinions is following:

www.jukkarannila.fi/lausunnot.html

Information about previous Australian consultations:

EN: Opinion 54: Government Content Management System

http://www.jukkarannila.fi/lausunnot.html#nro_54

EN: Opinion 56: National Identity Proofing Guidelines

http://www.jukkarannila.fi/lausunnot.html#nro_56

EN: Opinion 57: Updating the Commonwealth Procurement Rules

http://www.jukkarannila.fi/lausunnot.html#nro_57

EN: Opinion 72: Queensland biofuel mandate

http://www.jukkarannila.fi/lausunnot.html#nro_72

EN: Opinion 73: Financial / Conceptual Frameworks

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

EN: Opinion 78: Consumer Complaints Register (NSW)

http://www.jukkarannila.fi/lausunnot.html#nro_78

EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015

http://www.jukkarannila.fi/lausunnot.html#nro_79

EN: Opinion 85: Regulatory options for automated vehicles

http://www.jukkarannila.fi/lausunnot.html#nro_85

EN: Opinion 87: Assessing privacy and big data on the Internet

http://www.jukkarannila.fi/lausunnot.html#nro_87

EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)

http://www.jukkarannila.fi/lausunnot.html#nro_90

EN: Opinion 103: About lobbying - New South Wales

http://www.jukkarannila.fi/lausunnot.html#nro_103

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232

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237

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