1
2   TO:
3   Unit G.1: Data Policy and Innovation
4   Directorate-General for Communications Networks, Content and Technology (CONNECT)
5   European Commission
6
7   **Ref. Ares(2021)3527151 - 28/05/2021**
8   **Data Act (including the review of the Directive 96/9/EC on the legal protection of databases)**
9
10
11   First of all, a lot of thanks to Directorate-General for Communications Networks, Content and
12   Technology (CONNECT) for organising this important 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.
26
27
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

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42
43 **About previous consultations / Repeating several issues**
44
45 Annex 1 holds information about previous consultations. I have repeated the same issues several
46 times and previous consultation documents can be assessed critically. Different units of the
47 European Commission already know something about my previous opinions.
48
49 **Highlighting only some issues**
50
51 This opinion does not handle all issues which are mentioned on the consultation document. I have
52 presented different issues to different units of the European Commission. Generally speaking many
53 proposals are already implemented and therefore I don't present all possible issues based on this
54 consultation.
55
56 **The consultation document is technologically neutral and does not mention specific company**
57 **names**
58
59 It is fully understandable that the consultation document is technologically neutral. It is also fully
60 understandable that the consultation document does not mention specific company names.
61
62 **About different contracts**
63
64 Objectives and Policy options (Part B of the consultation document) contains following texts:
65
66   **"Promote fairness in B2B data sharing contracts"**
67   **"Provide for a harmonious application of the conditions applicable"**
68   **"Improve legal certainty"**
69   **"Such test could be complemented by model contract terms recommended by the**
70   **Commission"**
71
72 I propose following.
73
74   **Proposal: There could be different ready-made contract models.**
75
76   **Proposal: Different ready-made contract models could have clear graphical figures**
77   **showing the content of different contract models.**
78

79

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80
81 An example of a graphical figure is the EU Ecolabel which provides information for consumers and
82 other stakeholders. When using the EU Ecolabel graphical figure a business can inform about
83 adherence to EU Ecolabel regulations.
84
85 Another example of of a graphical figure is [1] Creative Commons. When using the figure provided
86 by Creative Commons it is possible to show the selected licence for sharing creative works. The
87 following figure informs that the selected license is following: "Attribution-NonCommercial-
88 NoDerivatives 4.0 International (CC BY-NC-ND 4.0)".
89
90
91
92 Yet another example of a graphical figure is the EU organic logo. The EU organic logo gives a
93 coherent visual identity to European Union produced organic products.
94

95
96
97 Perhaps I made my point clear. There could be different ready-made contract models which could
98 have clear graphical figures for showing the content of specific contract models.
99
100 **About different technical standards**
101
102 Objectives and Policy options (Part B of the consultation document) contains following text:
103
104   **"Improve technical standards for portability of data generated by individuals".**
105
106 Here we can note that there are different standards – horizontal/vertical or open/closed.
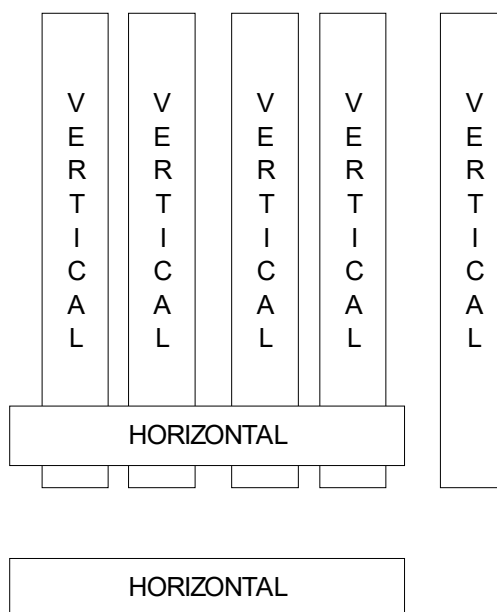107
108
109 **Favouring horizontal standards**
110
111 [Continues on the next page]

1   https://creativecommons.org/, Creative Commons

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│ V │ │ V │ │ V │ │ V │    │ V │
│ E │ │ E │ │ E │ │ E │    │ E │
│ R │ │ R │ │ R │ │ R │    │ R │
│ T │ │ T │ │ T │ │ T │    │ T │
│ I │ │ I │ │ I │ │ I │    │ I │
│ C │ │ C │ │ C │ │ C │    │ C │
│ A │ │ A │ │ A │ │ A │    │ A │
│ L │ │ L │ │ L │ │ L │    │ L │
├───┴─┴───┴─┴───┴─┴───┤    │   │
│     HORIZONTAL      │    │   │
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        ┌─────────────────────┐
        │     HORIZONTAL      │
        └─────────────────────┘
```

112
113
114   There are differences between horizontal and vertical standards. A simple example is naturally
115   email solutions. There are several vertical standards when creating technically email solutions. Then
116   there are horizontal standards which enable sending messages between technically different email
117   solutions.
118
119   **Proposal: There could be assessment of vertical and horizontal standards.**
120
121   **Proposal: Using horizontal standards could be favoured when creating different**
122   **information systems on the European Union level.**
123
124   Horizontal standards enables technological solutions which can work together. Horizontal standards
125   hides different complexities in information systems.
126
127   **Opinion: The number of redundant standardisation efforts should be minimal.**
128
129   **Proposal: There could be separation of horizontal standards and vertical standards.**
130
131   **Proposal: There could be different standardisation efforts to horizontal standards and**
132   **vertical standards.**
133
134   Personally I have advocated using different horizontal standards. For example email standards
135   (horizontal) are implemented with very different technologies (vertical).
136
137   Here we can note some problems:
138
139

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140   •   some systems are based on **de-facto** standards
141   •   some systems are based on **de-jure** standards
142   •   there can be confrontations between **de-facto** and **de-jure** standards
143   •   there can be a monopoly situation in some domain
144   •   some standards may inhibit possible actions of some stakeholders
145   •   there can be a standard war on some domains
146   •   standards have different life-cycles
147   •   systems have different life-cycles
148   •   there can be mismatches between different life-cycles
149   •   there can be failed standards
150   •   there can be deprecated standards.
151
152   It is quite normal situation in the information technology field that there are competing standards
153   for some application field. Therefore there are all the time ongoing "standards wars" or "format
154   wars". The information technology standards tend to be interrelated and one "standards war" or
155   "format war" can lead to another similar situation.
156
157   I have advocated open standards even though in some cases open standards are not de facto
158   standards. In practice public sector has very important role, when some standards are competing in
159   the market place. Because public sector has a considerable power when buying/developing
160   information systems and therefore public sector can sometimes direct markets to certain standards.
161   Therefore there should be serious vigilance when assessing different standards and "standards" in
162   some application fields.
163
164   There are different standards setting organisations on the information technology field. One list [2] of
165   these standards setting organisations is provided by ConsortiumInfo.org.
166
167   One warning can be said about standards setting organisations. All standards setting organisations
168   are not successes based on several factors and there can may irrelevant standards setting
169   organisations. Market situation on different vehicle markets varies a lot based on different factors.
170
171   **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**
172   **different standard setting organisations could be assessed carefully.**
173
174   Personally I have advocated using different horizontal standards. For example email standards
175   (horizontal) are implemented with very different technologies (vertical).
176
177   **Proposal: Governments should especially concentrate on horizontal standards.**
178
179   **Proposal: Some government agencies could apply for memberships of different**
180   **standard setting organisations which develop especially horizontal standards.**
181
182   **Proposal: Government agencies should not be passive by-standers when different**
183   **horizontal standards are developed.**

2   Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php

184
185   **Proposal: Government agencies could financially support development of horizontal**
186   **standards.**
187
188   **Proposal: There could some guidance for using open horizontal standards on different**
189   **application fields.**
190
191 **Accessing data → application programming interface (APIS)**
192
193 Objectives and Policy options (Part B of the consultation document) contains following text:
194
195   **"The horizontal modalities would address the question of how parties agree to access**
196   **data, while potential sector specific data access rights could be established by sector**
197   **specific rules, where justified."**
198
199 This leads us to different application programming interface (APIS)
200
201 **Different application programming interface (APIS)**
202
203 There can be several APIs implemented in different information system. The natural problem with
204 APIs is timeline of different systems which implement different APIs. There can be new and old
205 systems which implement different APIs.
206
207   **Proposal: Different information systems (EU-wide systems and member state systems)**
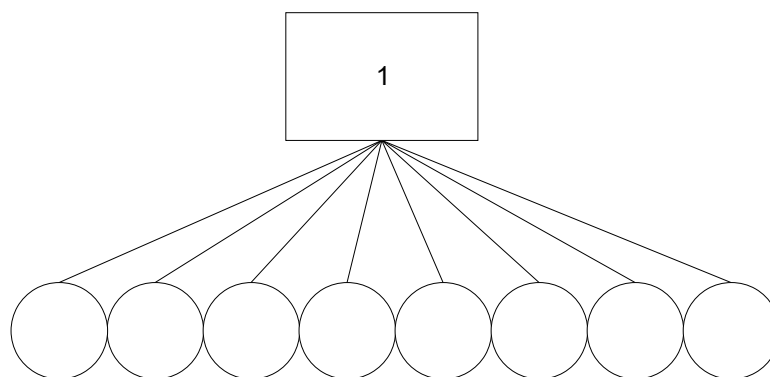208   **could be assessed based on _implementation of different APIs_.**
209
210 Here can be noted that there can several APIs implemented in different information systems.
211

212
213
214 One issue can be different versions of APIs. Based on timelines of different systems there can be
215 different API versions in use.
216
217 **Five basic functions for all information technology solutions**
218

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219   Generally speaking all information technology solutions have five basic functions:
220
221   •   retrieve
222   •   add
223   •   change
224   •   remove
225   •   administration.
226
227   Generally speaking most used function is retrieving information from different systems.
228
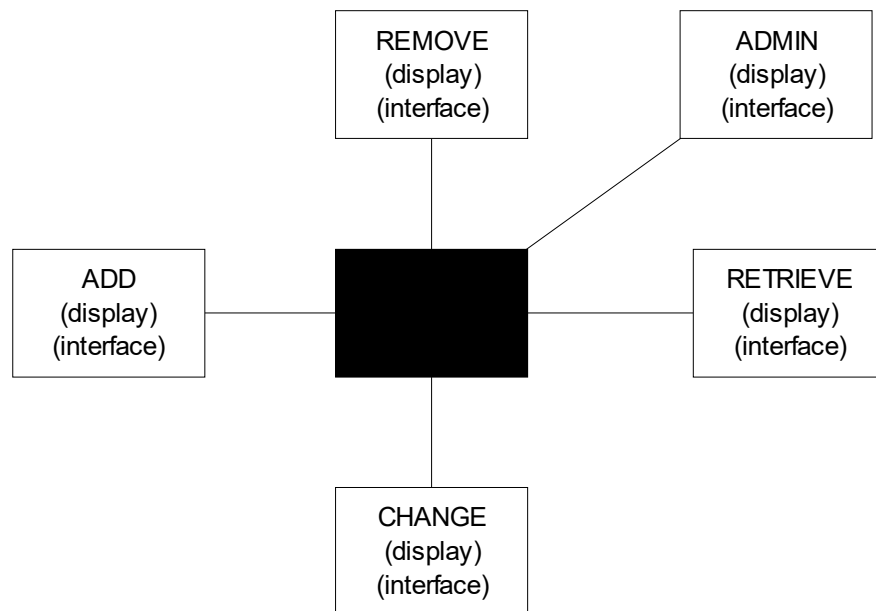229   **Black box – Information technology solutions**
230
231   Usually we are using information systems without knowledge about internal functions – this can be
232   described as black box solution.
233
234   In many cases four basic functions (add, remove, change, retrieve) are working well without
235   problems (black box).
236

```
                    ┌──────────────┐      ┌──────────────┐
                    │   REMOVE     │      │    ADMIN     │
                    │  (display)   │      │  (display)   │
                    │ (interface)  │      │ (interface)  │
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   ┌──────────────┐     ┌──■■■■■■■■■┐      ┌──────────────┐
   │    ADD       │     │           │      │  RETRIEVE    │
   │  (display)   │─────│  ■■■■■■■■  │──────│  (display)   │
   │ (interface)  │     │           │      │ (interface)  │
   └──────────────┘     └────┬──────┘      └──────────────┘
                             │
                    ┌──────────────┐
                    │   CHANGE     │
                    │  (display)   │
                    │ (interface)  │
                    └──────────────┘
```

237
238
239   Here we can note that providers of different information technology can read data of some
240   information technology solutions. Providers of different information technology solutions can also
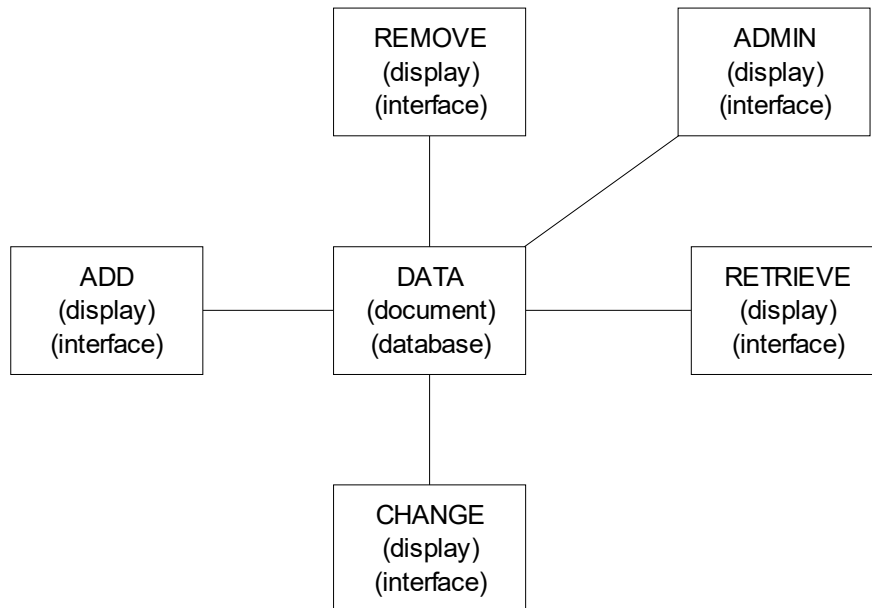241   develop programs and machinery.
242
243   **White box – Information technology solutions**
244
245   In some cases (open of free software) information about programs and machinery can be accessed
246   by several stakeholders – i.e. white box.

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247

```
                  ┌──────────┐              ┌──────────┐
                  │  REMOVE  │              │  ADMIN   │
                  │ (display)│              │ (display)│
                  │(interface)│             │(interface)│
                  └────┬─────┘              └────┐─────┘
                       │                         │
  ┌──────────┐    ┌────┴─────┐              ┌──────────┐
  │   ADD    │    │   DATA   │              │ RETRIEVE │
  │ (display)├────┤(document)├──────────────┤ (display)│
  │(interface)│   │(database)│              │(interface)│
  └──────────┘    └────┬─────┘              └──────────┘
                       │
                  ┌────┴─────┐
                  │  CHANGE  │
                  │ (display)│
                  │(interface)│
                  └──────────┘
```

248
249
250 Here we can note that different APIs can be used with closed systems and there is no need to
251 understand internal working of an information system.
252
253   **Proposal: There could be some guidance for different APIs (retrieve, add, change,**
254   **remove, (administration)) when actually doing some functions.**
255
256 Here we can note that different APIs can be open or closed.
257
258   **Proposal: There could be some guidance for creating open APIs.**
259
260 **Adding more details for information technology solutions**
261
262
263 [Continues on the next page]

| ADD (display) (interface) | RETRIEVE (display) (interface) | CHANGE (display) (interface) | REMOVE (display) (interface) |

ADMIN — PROGRAM — DATA (model)

ADMIN — OPERATING SYSTEM — document database — ADMIN

ADMIN — PROCESSOR (machinery)
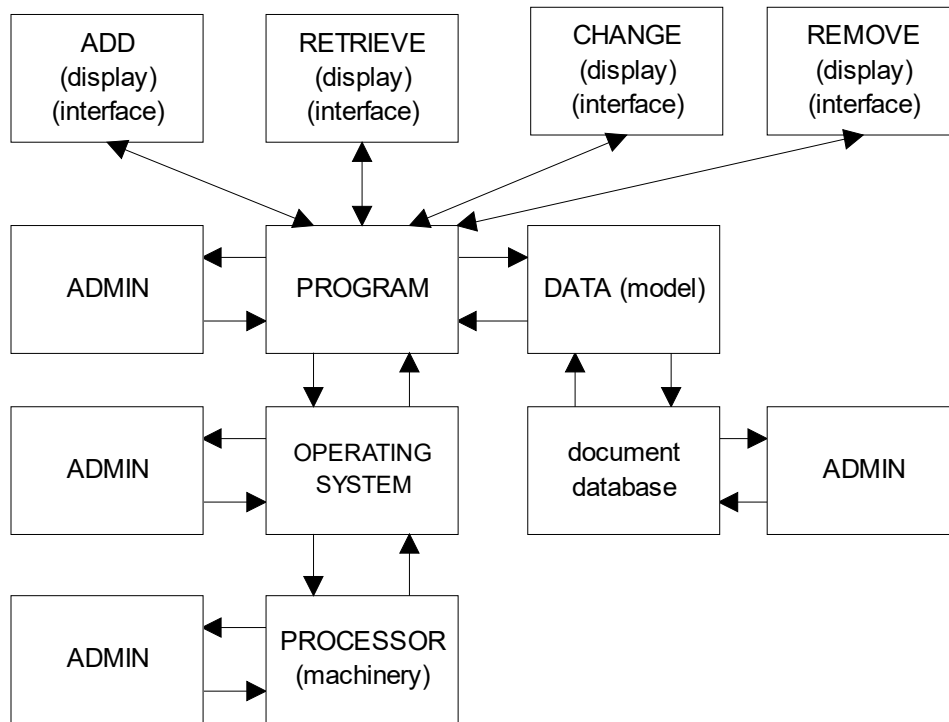
264
265
266 All information technology solutions have also processor(s) (machinery), operating system(s) and
267 program(s). Processor(s) (machinery), operating system(s) and program(s) all need administration
268 for keeping a system up-to-date. All programs handle data in some format and data can be
269 database(s) and/or document(s).
270
271 **Owner, member, agreement, standards, openness and closeness**
272
273 Here we can note the difference between owners, agreements and members. In reality ownerships
274 agreements and memberships cause very complex networks, and those networks are changing all
275 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
276 entities, life-cycles, etc.
277
278 Here we can note that ownership, agreement and membership are interlinked in different ways.
279 Generally speaking average usage of a system means an unique combination of ownership,
280 agreement and membership. When everything works fine there are not problems. However changes
281 with ownership, agreement and membership can result difficult situations.
282
283 All previously mentioned issues can be based on ownership, membership and agreements. There
284 can be also different standards, which can be open or closed.
285
286
287 [Continues on the next page]

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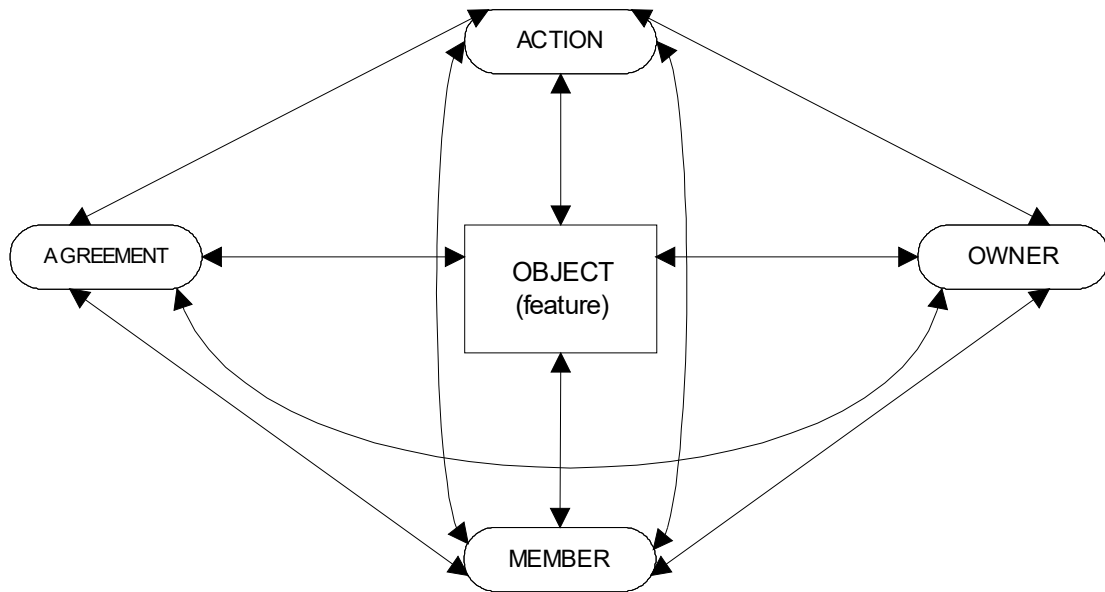
288
289   **Note: The relations between different aspects of information systems can result**
290   **rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**
291
292   Based on previous presentations it is possible to present following table.
293

	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				

294
295   Here we can note that there are unique situations with ownership, membership and agreements.

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296
297   **NOTE: Unique situations with ownership, membership and agreements complicates**
298   **usage of different information systems.**
299
300   Objectives and Policy options (Part B of the consultation document) contains following text:
301
302   **A horizontal dispute settlement mechanism could provide a solution in cases where**
303   **parties are not able to find an agreement.**
304
305   This proposal can be supported since unique situations with ownership, membership and
306   agreements can be rather complex and there can be different disputes when using different
307   information systems.
308
309   **About number of features**
310
311   Objectives and Policy options (Part B of the consultation document) contains following text:
312
313   **"As it regards the latter, more far reaching sub-option, the obligatory provision should**
314   **stipulate that, on request of the user organisation, its data must be exported in a**
315   **structured, widely used and machine-readable format, for free or against an additional,**
316   **but modest specified maximum fee, or fee structure, depending on the different use**
317   **cases, in full compliance with the EU data protection legislation."**
318
319   This leads us to features and requirements and implementing features and requirements.
320
321   **Features and requirements in different information systems**
322
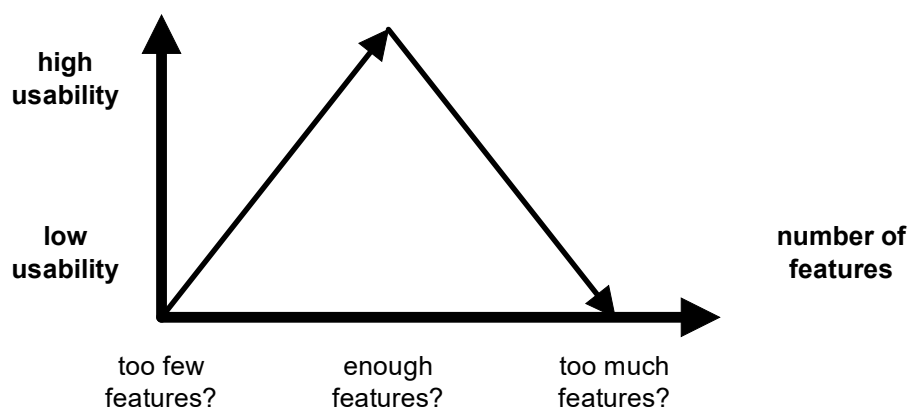
323
324
325   One issue is assessment of different features.
326
327   **Proposal: Number of different information system features could assessed carefully.**

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328
329   **Proposal: There should not be too much features in information systems.**
330
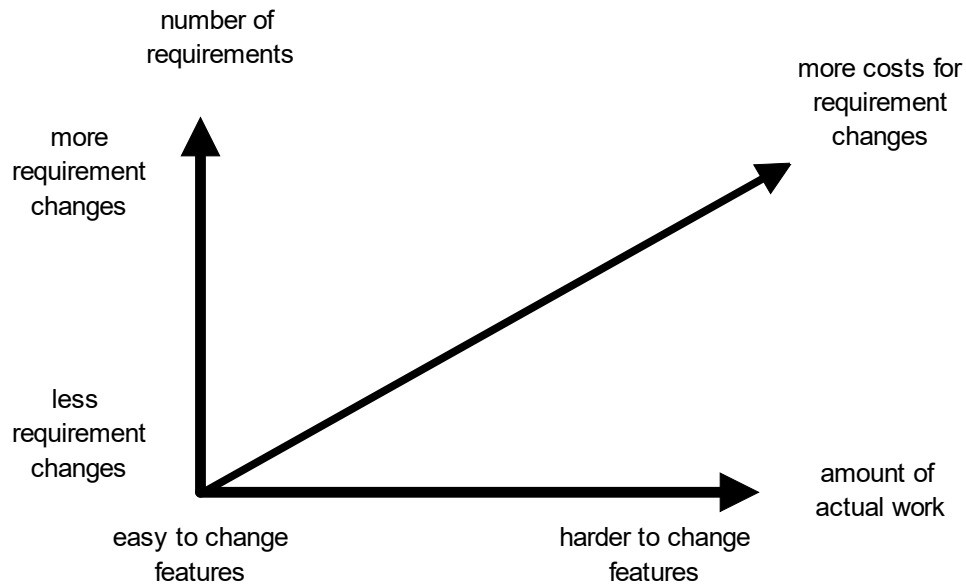
331
332
333   One issue is number of different requirements. There can be too many requirement changes which
334   mean more work for system developers.
335
336   **Proposal: Number of requirements could be assessed carefully.**
337
338   **Proposal: All new requirements should be assessed very carefully before implementing**
339   **different requirements in different information systems.**
340
341   **Possible technical consultations**
342
343   **Proposal: There could be more technical consultations based on results of this**
344   **consultation.**
345
346
347   [Continues on the next page]
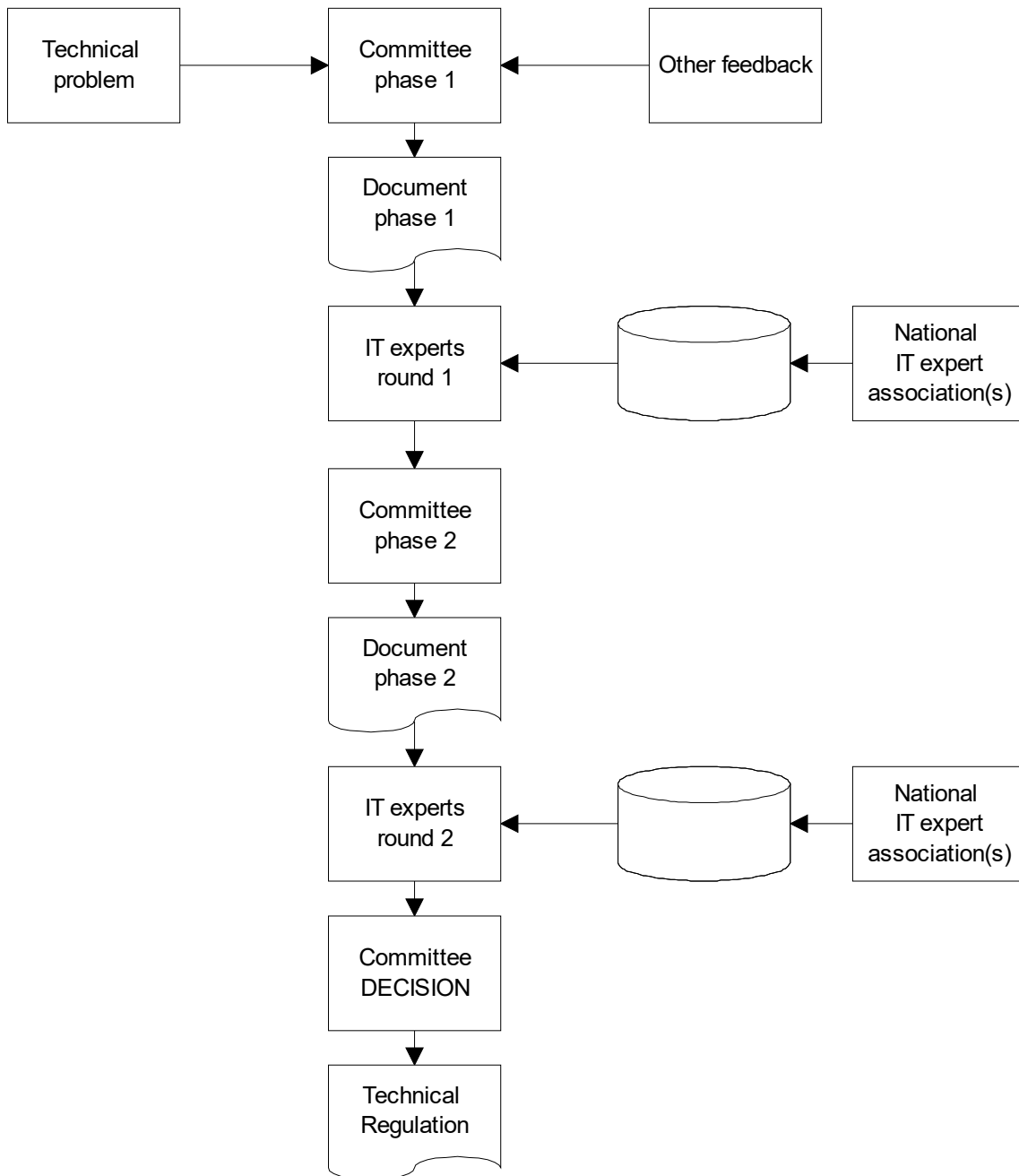
348
349
350   An example of more technical consultation could be assessment of different XML formats. One
351   option is distributing information about technical consultations to different information technology
352   expert associations. Naturally there can be different phases (e.g. two phases) for assessing different
353   information technology issues.
354
355   **Proposal: Information about more technical consultations could be distributed for**
356   **different information technology expert associations.**

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357
358 Objectives and Policy options (Part B of the consultation document) contains following text:
359
360   **"Explore the possibility to define essential requirements for smart contracts'**
361   **interoperability that could accompany a potential mandate for the European**
362   **Standardisation Organisations for setting technical standards for smart contracts. The**
363   **Data Act could define such essential requirements and foresee the possibility to**
364   **designate the European standards ensuing from the aforementioned mandate as**
365   **European harmonised standards. The latter would mitigate the risk of market**
366   **fragmentation while also providing technical support for the creation of data spaces."**
367
368 Here we can not that interoperability is implemented based on several layers.
369
370 **Interoperability between different versions**
371
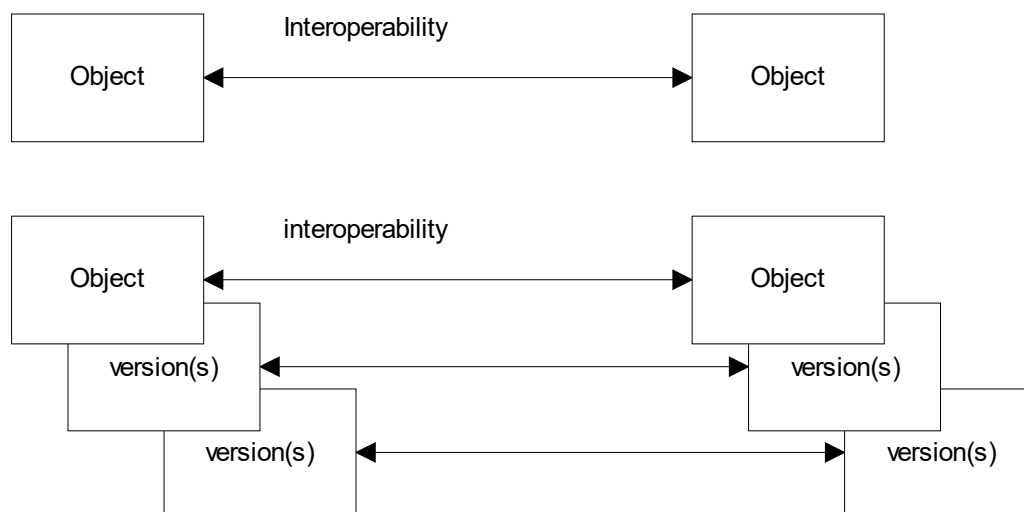
372
373
374 One problem is naturally different versions of digital objects.
375
376   **Proposal: There could be careful assessment of interoperability based on versions of**
377   **digital objects.**
378
379 It can be noted that different versions of digital objects may cause problems for interoperability.
380
381 One issue for interoperability are different viewpoints.
382
383
384 [Continues on the next page]

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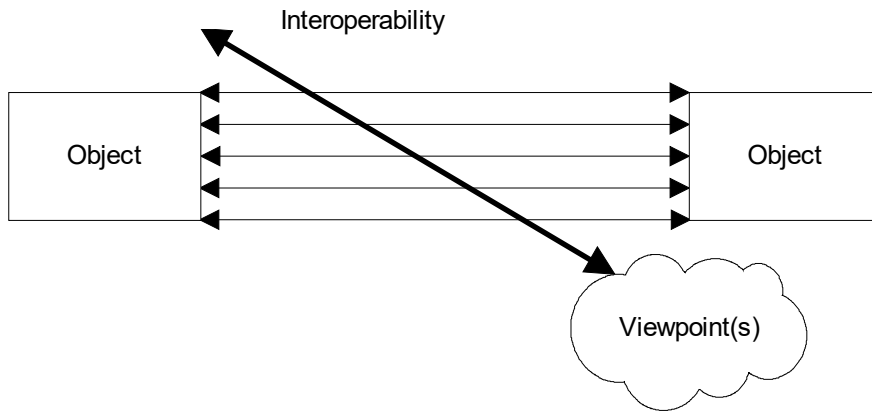
385
386
387   **Proposal: Different viewpoints for assessing interoperability could be evaluated very**
388   **carefully.**
389
390   It can be noted that there can be some new viewpoints in the future.
391
392   **Balance between general requirements and special requirements**
393
394   Here we can note the balance between general knowledge and special knowledge – this means also
395   balance between general requirements and special requirements for reporting financial and non-
396   financial information.
397
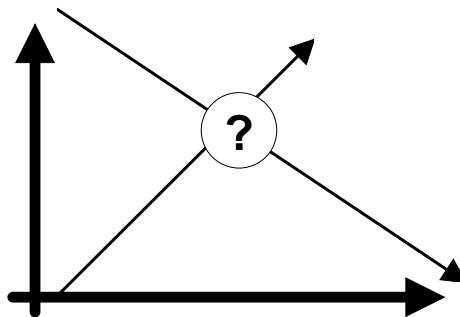
398
399
400   There are several special knowledge areas. Different entities work on different (knowledge) areas
401   and they need information which can be very specific information. The problem seems to be the
402   balance with general and special information.
403
404   **Experts on different domains – ICT experts and domain experts**

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405
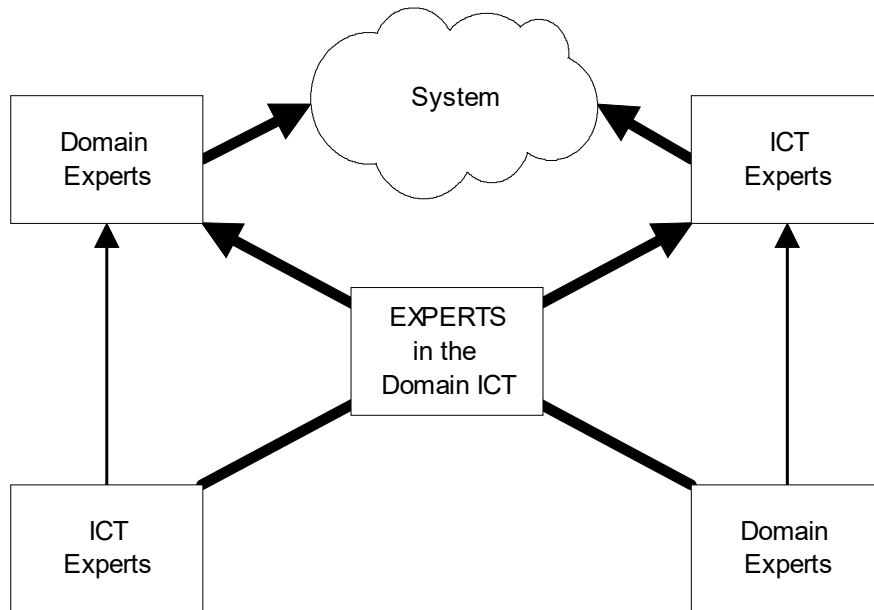
406
407
408   Here we can note that developing an information system means large-scale cooperation between
409   ICT experts and domain experts. Generally speaking developing an information system means also
410   large-scale learning processes – both ICT experts and domain experts learn different issues.
411
412   **NOTE: large-scale learning processes demand time since learning processes are not**
413   **straight-forward simple processes.**
414
415   **EU-wide level?**
416
417   I have noted several times that different member state systems (MSS) can interlinked in many ways.
418   This means that co-operation with European Union systems means a lot of work. This leads to the
419   question of a European Contact Point (EUCP) for different member state systems (MSS).
420
421
422   [Continues on the next page]

1
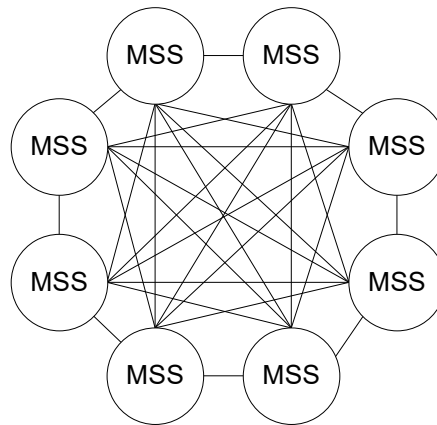
423
424   **MSS = Member State System**
425
426   There are 28 member states (European Union) at the moment. In reality there are unique situations
427   with information systems in different member states. In some cases information systems can be
428   implemented based on complex system-to-system connections. Complex system-to-system
429   connections means a lot of work when there are changes in some systems.
430
431   Naturally there could be direct contacts between different member state systems (MSS) and
432   European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
433   number of different member state system. Based on 27 member state systems there could be
434   hundreds of connections:
435
436   27 x 10 = 270 MSS ↔ 1 EUCP
437   27 x 20 = 540 MSS ↔ 1 EUCP
438   27 x 30 = 810 MSS ↔ 1 EUCP
439
440   Here we can note that there can be hierarchy between different system (EU ↔ member states) and
441   there can be member state contact points (MCP). Then there can be some hierarchy between
442   different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
443   with member state systems in member states. Therefore member state contact points (MCP) can
444   reduce the complexity with European Union contact point (EUCP)
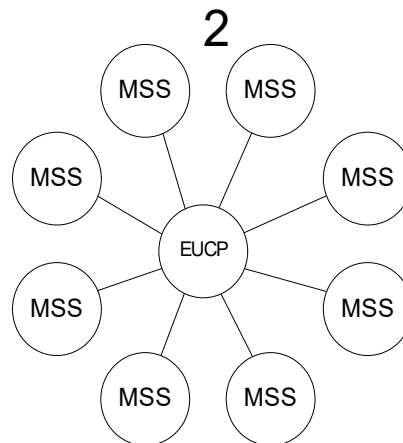445
446   Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
447   that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
448
449
450   [Continues on the next page]

2

```
        MSS   MSS
    MSS            MSS
          EUCP
    MSS            MSS
        MSS   MSS
```

MSS = Member State System, EUCP = European Contact Point

451
452
453
454 In the current situation, European Union member states (and some co-operation states) have their
455 own internal IDs for several information systems. Also, the members states organised as a
456 federation have their own internal problems with state-level IDs.
457
458 Based on those calculations there could be a lot of direct connections to the European contact point.
459 Number of those connections can be overwhelming. The situation between member states can vary
460 in many ways. So there can different and unique systems between member states.
461
462 On the other hand, there are some working examples of joined or federated EU-wide registers.
463 However, the amount of administration and needed legally binding agreements is considerable.
464
465   **Proposal : There could be one information system (member state contact point, MSCP)**
466   **on member state level.**
467
468
469 [Continues on the next page]

3
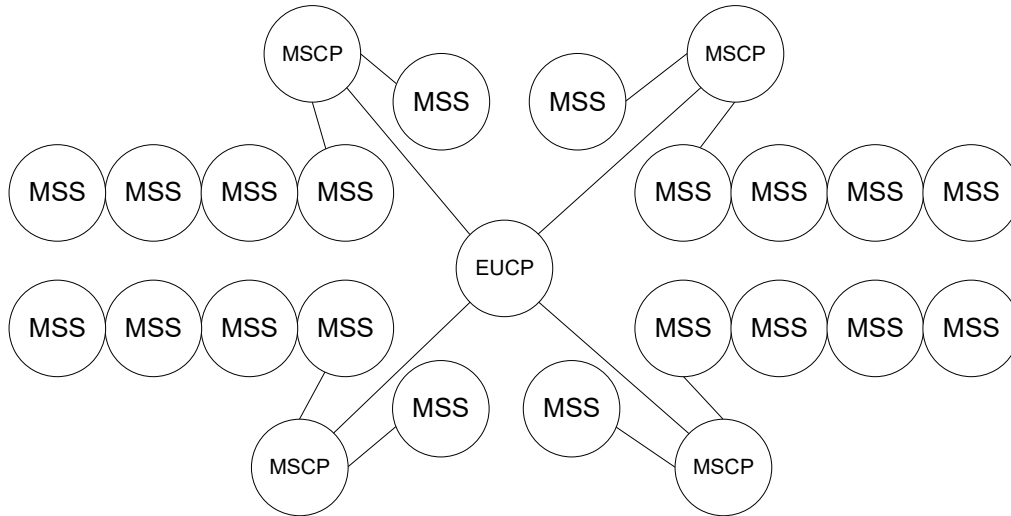
MSS = Member State System
MSCP = Member State Contact Point, EUCP = European Contact Point

470
471
472
473
474 The solution can be, that member states have own Member State Contact Points (MSCP) and
475 different state level systems are combined gradually. Then the member state system IDs can be used
476 in the European Contact Point (EUCP).
477
478 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
479 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
480
481 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
482 there can be member state contact points (MCP). Then there can be some hierarchy between
483 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
484 with member state systems in member states. Therefore member state contact points (MCP) can
485 reduce the complexity with European Union contact point (EUCP).
486
487   **Proposal: Different member state systems could be consolidated based on limited**
488   **number system-to-system connections.**
489
490   **Proposal: There could be some time frames for consolidating different member state**
491   **systems (MSS) with member state contact points (MSCP).**
492
493   **Proposal: There could be some time frames for consolidating member state contact**
494   **points (MSCP) with the European Union contact point (EUCP).**
495
496   **Proposal: One information system (member state contact point, MSCP) on member**
497   **state level could handle system-to-system connections with the European Union level**
498   **(European contact point).**

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499

Proposal: There could be some serious work for developing a standardised member state contact point (MSCP).

Proposal: After developing a standardised member state contact point (MSCP) different member states could consolidate their systems (MSS ↔ MSCP).

Proposal: European Union contact point (EUCP) and member state contact points (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European Union level.

Naturally we have to note that developing a standardised member state contact point (MSCP) means more work. On the other hand a standardised member state contact point (MSCP) could handle cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member states may have more systems than other member states. We have to note that there are different systems based on several technological solutions.

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

I have advocated usage of web feeds [3] on several previous opinion documents. I have advocated usage of web feeds on several previous opinion documents. Actually there are two standards for web feeds: RSS [4] [5] and Atom [6] [7] [8].

Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different informations systems.

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

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

---

3   https://en.wikipedia.org/wiki/Web_feed
4   http://www.rssboard.org/rss-specification, RSS 2.0 Specification
5   https://en.wikipedia.org/wiki/RSS, Wikipedia / RSS
6   https://en.wikipedia.org/wiki/Atom_(standard), Wikipedia / Atom (standard)
7   https://tools.ietf.org/html/rfc4287, The Atom Syndication Format
8   https://tools.ietf.org/html/rfc5023, The Atom Publishing Protocol

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535   **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
536
537   It can be easier to create web feeds in different information systems since web feeds enable
538   connections without direct system-to-system connections.
539
540   It can be noted, that different back-office systems (with a wide variety of different technologies) can
541   implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
542   kind solutions front-office systems don´t need direct system-to-system communications with back-
543   office systems.
544
545
546
547   **Good luck!!!**
548
549   This opinion is quite limited. Hopefully there are other constructive ideas presented in other
550   opinions. This remains to be seen.
551
552
553   [Continues on the next page]

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554

555   **ANNEX 1**

556

557

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

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

560 http://www.jukkarannila.fi/lausunnot.html

561

562

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

564 by the European Commission.

565

566 EN: Opinion 1: Review of the rules on access to documents

567 http://www.jukkarannila.fi/lausunnot.html#nro_1

568

569 EN: Opinion 2: Schools for the 21st Century

570 http://www.jukkarannila.fi/lausunnot.html#nro_2

571

572 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for

573 Safe and Innovative medicines

574 http://www.jukkarannila.fi/lausunnot.html#nro_3

575

576 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

577 http://www.jukkarannila.fi/lausunnot.html#nro_5

578

579 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

580 http://www.jukkarannila.fi/lausunnot.html#nro_6

581

582 EN: Opinion 8: European Interoperability Framework, version 2, draft

583 http://www.jukkarannila.fi/lausunnot.html#nro_8

584

585 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS

586 proposal for comments

587 http://www.jukkarannila.fi/lausunnot.html#nro_9

588

589 EN: Opinion 15: Collective Redress

590 http://www.jukkarannila.fi/lausunnot.html#nro_15

591

592 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

593 http://www.jukkarannila.fi/lausunnot.html#nro_17

594

595 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

596 http://www.jukkarannila.fi/lausunnot.html#nro_18

597

598

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599 EN: Opinion 19: Official Acknowledgement by the Commission
600 http://www.jukkarannila.fi/lausunnot.html#nro_19
601
602 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
603 http://www.jukkarannila.fi/lausunnot.html#nro_20
604
605 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
606 http://www.jukkarannila.fi/lausunnot.html#nro_21
607
608 EN: Opinion 23: Public consultation on the review of the European Standardisation System
609 http://www.jukkarannila.fi/lausunnot.html#nro_23
610
611 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
612 http://www.jukkarannila.fi/lausunnot.html#nro_27
613
614 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
615 http://www.jukkarannila.fi/lausunnot.html#nro_28
616
617 EN: Opinion 30: Internet Filtering
618 http://www.jukkarannila.fi/lausunnot.html#nro_30
619 NOTE: Organised by the European Committee for Standardization (CEN) [9]
620
621 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
622 http://www.jukkarannila.fi/lausunnot.html#nro_32
623
624 EN: Opinion 34: REMIT Registration Format
625 http://www.jukkarannila.fi/lausunnot.html#nro_34
626 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [10]
627
628 EN: Opinion 35: Exploiting the employment potential of the personal and household services
629 http://www.jukkarannila.fi/lausunnot.html#nro_35
630
631 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
632 http://www.jukkarannila.fi/lausunnot.html#nro_37
633
634 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
635 http://www.jukkarannila.fi/lausunnot.html#nro_39
636
637 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
638 http://www.jukkarannila.fi/lausunnot.html#nro_40
639
640 EN: Opinion 41: AT.39398: observations on the proposed commitments
641 http://www.jukkarannila.fi/lausunnot.html#nro_41

9 http://www.cen.eu/ (Accessed 2 July 2012)
10 http://www.acer.europa.eu/ (Accessed 2 July 2012)

642
643   EN: Opinion 42: Opening up Education
644   http://www.jukkarannila.fi/lausunnot.html#nro_42
645
646   EN: Opinion 43: Publication of extracts of the European register of market participants
647   http://www.jukkarannila.fi/lausunnot.html#nro_43
648   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
649
650   EN: Opinion 44: Evaluation policy guidelines
651   http://www.jukkarannila.fi/lausunnot.html#nro_44
652
653   EN: Opinion 45: About ICT standardisation
654   http://www.jukkarannila.fi/lausunnot.html#nro_45
655
656   EN: Opinion 46: Review of the EU copyright rules
657   http://www.jukkarannila.fi/lausunnot.html#nro_46
658
659   EN: Opinion 51: European Area of Skills and Qualifications
660   http://www.jukkarannila.fi/lausunnot.html#nro_51
661
662   EN: Opinion 52: Trusted Cloud Europe Survey
663   http://www.jukkarannila.fi/lausunnot.html#nro_52
664
665   EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
666   http://www.jukkarannila.fi/lausunnot.html#nro_53
667   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
668
669   EN: Opinion 55: European Energy Regulation
670   http://www.jukkarannila.fi/lausunnot.html#nro_55
671   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
672
673   EN: Opinion 59: Green paper on mobile Health
674   http://www.jukkarannila.fi/lausunnot.html#nro_59
675
676   EN: Opinion 60: Cross-border inheritance tax problems within the EU
677   http://www.jukkarannila.fi/lausunnot.html#nro_60
678
679   EN: Opinion 61: European Register of Products Containing Nanomaterials
680   http://www.jukkarannila.fi/lausunnot.html#nro_61
681
682   EN: Opinion 64: Corporate Social Responsibility - European Commission
683   http://www.jukkarannila.fi/lausunnot.html#nro_64
684
685   EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
686   http://www.jukkarannila.fi/lausunnot.html#nro_66

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687   EN: Opinion 68: European Network Code Stakeholder Committees
688   http://www.jukkarannila.fi/lausunnot.html#nro_68
689   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
690
691   EN: Opinion 71: Common Schema for the Disclosure of Inside Information
692   http://www.jukkarannila.fi/lausunnot.html#nro_71
693   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
694
695   EN: Opinion 74: Enabling the Internet of Things
696   http://www.jukkarannila.fi/lausunnot.html#nro_74
697   NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) [11]
698
699   EN: Opinion 80: Mandatory Transparency Register
700   http://www.jukkarannila.fi/lausunnot.html#nro_80
701
702   EN: Opinion 84: Revision of the European Interoperability Framework
703   http://www.jukkarannila.fi/lausunnot.html#nro_84
704
705   EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
706   http://www.jukkarannila.fi/lausunnot.html#nro_86
707
708   EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
709   http://www.jukkarannila.fi/lausunnot.html#nro_88
710
711   EN: Opinion 89: BEREC Guidelines for net neutrality rules
712   http://www.jukkarannila.fi/lausunnot.html#nro_89
713   NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
714
715   EN: Opinion 93: Safety of apps and other non-embedded software
716   http://www.jukkarannila.fi/lausunnot.html#nro_93
717
718   EN: Opinion 95: Targeted consultation on eForms
719   http://www.jukkarannila.fi/lausunnot.html#nro_95
720
721   EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
722   http://www.jukkarannila.fi/lausunnot.html#nro_97
723
724   EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
725   http://www.jukkarannila.fi/lausunnot.html#nro_98
726
727   EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
728   Regulators. Recast
729   http://www.jukkarannila.fi/lausunnot.html#nro_99
730

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

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731   EN: Opinion 100: Protection of personal data (EU)
732   http://www.jukkarannila.fi/lausunnot.html#nro_100
733
734   EN: Opinion 101: Governance of the Energy Union
735   http://www.jukkarannila.fi/lausunnot.html#nro_101
736
737   EN: Opinion 102: Smart Wearables
738   http://www.jukkarannila.fi/lausunnot.html#nro_102
739
740   EN: Opinion 106: Review of the European Union Agency for Network and Information Security
741   (ENISA)
742   http://www.jukkarannila.fi/lausunnot.html#nro_106
743
744   EN: Opinion 108: Single Digital Gateway
745   http://www.jukkarannila.fi/lausunnot.html#nro_108
746
747   EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
748   http://www.jukkarannila.fi/lausunnot.html#nro_110
749
750   EN: Opinion 111: Interoperability of information systems for migration and security
751   http://www.jukkarannila.fi/lausunnot.html#nro_111
752
753   EN: Opinion 113: Transform of health and care
754   http://www.jukkarannila.fi/lausunnot.html#nro_113
755
756   EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
757   Internet
758   http://www.jukkarannila.fi/lausunnot.html#nro_114
759   NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
760
761   EN: Opinion 118: Fake news and online disinformation
762   http://www.jukkarannila.fi/lausunnot.html#nro_118
763
764   EN: Opinion 119: European Social Security Number
765   http://www.jukkarannila.fi/lausunnot.html#nro_119
766
767   EN: Opinion 120: European Labour Authority
768   http://www.jukkarannila.fi/lausunnot.html#nro_120
769
770   EN: Opinion 121: 2nd Data Package
771   http://www.jukkarannila.fi/lausunnot.html#nro_121
772
773   EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
774   Cybersecurity Research and Competence Centre
775   http://www.jukkarannila.fi/lausunnot.html#nro_122

776
777 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
778 THE COUNCIL on the re-use of public sector information (recast)
779 http://www.jukkarannila.fi/lausunnot.html#nro_123
780
781 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
782 http://www.jukkarannila.fi/lausunnot.html#nro_125
783
784 EN: Opinion 128: Summertime arrangements
785 http://www.jukkarannila.fi/lausunnot.html#nro_128
786
787 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
788 http://www.jukkarannila.fi/lausunnot.html#nro_129
789
790 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
791 http://www.jukkarannila.fi/lausunnot.html#nro_132
792
793 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
794 ("eForms")
795 http://www.jukkarannila.fi/lausunnot.html#nro_133
796
797 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
798 UCC
799 http://www.jukkarannila.fi/lausunnot.html#nro_134
800
801 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
802 http://www.jukkarannila.fi/lausunnot.html#nro_139
803
804 EN: Opinion 141: Farm Accountancy Data Network
805 http://www.jukkarannila.fi/lausunnot.html#nro_141
806
807 EN: Opinion 142: Horizon Europe (two consultations)
808 http://www.jukkarannila.fi/lausunnot.html#nro_142
809
810 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
811 (evaluation)
812 http://www.jukkarannila.fi/lausunnot.html#nro_144
813
814 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
815 http://www.jukkarannila.fi/lausunnot.html#nro_146
816 NOTE: Organised by the European Committee for Standardization (CEN)
817
818 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
819 http://www.jukkarannila.fi/lausunnot.html#nro_147
820

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821 EN: Opinion 152: Revision of the Non-Financial Reporting Directive
822 http://www.jukkarannila.fi/lausunnot.html#nro_152
823
824 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
825 http://www.jukkarannila.fi/lausunnot.html#nro_154
826
827 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
828 2021
829 http://www.jukkarannila.fi/lausunnot.html#nro_156
830
831 EN: Opinion 159: EU competition law - market definition notice (evaluation)
832 http://www.jukkarannila.fi/lausunnot.html#nro_159
833
834 EN: Opinion 161: New Competition Tool ('NCT')
835 http://www.jukkarannila.fi/lausunnot.html#nro_161
836
837 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
838 platforms acting as gatekeepers
839 http://www.jukkarannila.fi/lausunnot.html#nro_162
840
841 EN: Opinion 165: Legislative framework for the governance of common European data spaces
842 http://www.jukkarannila.fi/lausunnot.html#nro_165
843
844 EN: Opinion 166: Sharing information between national business registers
845 http://www.jukkarannila.fi/lausunnot.html#nro_166
846
847 EN: Opinion 167: Interoperable digital public services - European Interoperability Framework
848 evaluation & strategy
849 http://www.jukkarannila.fi/lausunnot.html#nro_167
850
851 EN: Opinion 169: Fighting child sexual abuse: detection, removal and reporting of illegal content
852 online
853 http://www.jukkarannila.fi/lausunnot.html#nro_169
854
855 EN: Opinion 170: Data sharing in the EU - common European data spaces (new rules)
856 http://www.jukkarannila.fi/lausunnot.html#nro_170
857
858 EN: Opinion 172: Guidance on tackling disinformation (update)
859 http://www.jukkarannila.fi/lausunnot.html#nro_172
860
861 EN: Opinion 173: Declaration of Digital Principles
862 http://www.jukkarannila.fi/lausunnot.html#nro_173
863

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