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TO:
Units B2 / D2
Directorate-General for Communications Networks, Content and Technology (Connect)
European Commission

Reference: Declaration of Digital Principles (Roadmap)

First of all, a lot of thanks to Directorate-General for Communications Networks, Content and Technology (Connect) 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 consultations at the European Union level.
Annex 2 holds information about copyright, licence and disclaimers.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

[Continues on the next page]

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 the consultation document. 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 The consultation document is technologically neutral and does not mention specific company
56 names**

57

58 It is fully understandable that the consultation document is technologically neutral. It is also fully
59 understandable that the consultation document does not mention specific company names.

60

61 Book / The Internet Trap / Mentioning specific company names

62

63 I recommend reading the book by Matthew Hindman. Matthew Hindman describes digital economy
64 with specific company names.

65

66 **Hindman, M. (2018). The Internet Trap: How the digital economy builds monopolies
67 and undermines democracy. Princeton, New Jersey: Princeton University Press.**

68

69 I read the Finnish version of the book.

70

71 **Hindman, M. (2019). Internet-ansa: Miten digitaalinen talous rakentaa monopoleja ja
72 nakertaa demokratiaa (K. Pietiläinen, Trans.). Helsinki: Terra Cognita.**

73

74 The darker side of the digital world

75

76 It can be noted that there is the darker side of the digital world. The European Commission (check
77 annex 1 for previous consultations) has organised some consultations which handle this darker side
78 of the digital world.

79

80 Naturally we should be aware of different problems with the digital world when advancing different
81 issues related to the digital world.

82

83 Digital Citizenship

84

85 The consultation document refers to different positive issues related to the **Digital Citizenship**.

86 Here we can note that there is nothing wrong with these positive issues.

87

88 **A set of digital principles that should shape europe’s digital society in the European way**

89

90 Here we can note that the proposed set of digital principles can be published as joint inter-
 91 institutional declaration. **All issues do not need new legislation.**

92

93 **Principle: Freedom of expression, including access to diverse, trustworthy and transparent**
 94 **information**

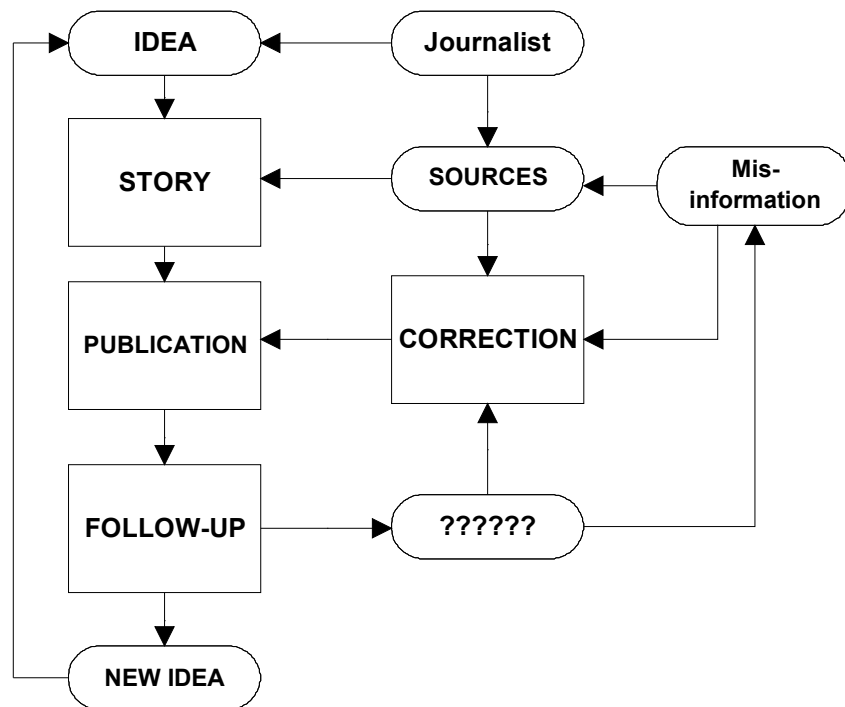
95

96 This principle of freedom of expression, including access to diverse, trustworthy and transparent
 97 information can be generally speaking supported.

98

99 However there is the problem on misinformation. Also journalists have problems with
 100 misinformation.

101



102

103

104 Correcting different misinformed claims should be handled efficiently. Problem of misinformation
 105 is accelerated since electronic networks can spread misinformation very efficiently.

106

107 Here we can note that we need international approach for handling issues related to misinformation.

108

109 **Proposal: The European Commission could have some guidelines for handling**
 110 **misinformation in different settings.**

111

112
113 The European Commission (check annex 1 for previous consultations) has organised some
114 consultations for assessing misinformation. Results of these consultations could be assessed
115 carefully.

116
117 **Proposal: The European Commission could assess again results of different**
118 **consultations related to misinformation.**

119
120 **Note: There may be some new forms of misinformation which could be also assessed.**

121
122 **Principle: Protection of personal data and privacy**

123
124 Here we can note that there can be secondary use data. In Finland we have Findata which promotes
125 secondary use data related health and social data.

126
127 Social and Health Data Permit Authority Findata
128 <https://findata.fi/en/>

129
130 **Proposal: The European Commission could have some guidelines for secondary use of**
131 **data.**

132
133 **Principle: Universal digital education and skills for people to take an active part in society**
134 **and in democratic processes**

135
136 Here we can note that there is a public consultation related to micro-credentials.

137
138 **Micro-credentials – broadening learning opportunities for lifelong learning and**
139 **employability**
140 [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12858-Micro-](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12858-Micro-credentials-broadening-learning-opportunities-for-lifelong-learning-and-employability_en)
141 [credentials-broadening-learning-opportunities-for-lifelong-learning-and-employability_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12858-Micro-credentials-broadening-learning-opportunities-for-lifelong-learning-and-employability_en)
142 Public consultation

143 **Deadline: 13 July 2021**

144
145 **Proposal: There could be different micro-credentials for learning different information**
146 **technology issues.**

147
148
149
150 **Good luck!!!**

151
152 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
153 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 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

- 199 EN: Opinion 19: Official Acknowledgement by the Commission
200 http://www.jukkarannila.fi/lausunnot.html#nro_19
201
- 202 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
203 http://www.jukkarannila.fi/lausunnot.html#nro_20
204
- 205 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
206 http://www.jukkarannila.fi/lausunnot.html#nro_21
207
- 208 EN: Opinion 23: Public consultation on the review of the European Standardisation System
209 http://www.jukkarannila.fi/lausunnot.html#nro_23
210
- 211 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
212 http://www.jukkarannila.fi/lausunnot.html#nro_27
213
- 214 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
215 http://www.jukkarannila.fi/lausunnot.html#nro_28
216
- 217 EN: Opinion 30: Internet Filtering
218 http://www.jukkarannila.fi/lausunnot.html#nro_30
219 NOTE: Organised by the European Committee for Standardization (CEN) ¹
220
- 221 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
222 http://www.jukkarannila.fi/lausunnot.html#nro_32
223
- 224 EN: Opinion 34: REMIT Registration Format
225 http://www.jukkarannila.fi/lausunnot.html#nro_34
226 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
227
- 228 EN: Opinion 35: Exploiting the employment potential of the personal and household services
229 http://www.jukkarannila.fi/lausunnot.html#nro_35
230
- 231 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
232 http://www.jukkarannila.fi/lausunnot.html#nro_37
233
- 234 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
235 http://www.jukkarannila.fi/lausunnot.html#nro_39
236
- 237 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
238 http://www.jukkarannila.fi/lausunnot.html#nro_40
239
- 240 EN: Opinion 41: AT.39398: observations on the proposed commitments
241 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)

- 242
243 EN: Opinion 42: Opening up Education
244 http://www.jukkarannila.fi/lausunnot.html#nro_42
245
246 EN: Opinion 43: Publication of extracts of the European register of market participants
247 http://www.jukkarannila.fi/lausunnot.html#nro_43
248 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
249
250 EN: Opinion 44: Evaluation policy guidelines
251 http://www.jukkarannila.fi/lausunnot.html#nro_44
252
253 EN: Opinion 45: About ICT standardisation
254 http://www.jukkarannila.fi/lausunnot.html#nro_45
255
256 EN: Opinion 46: Review of the EU copyright rules
257 http://www.jukkarannila.fi/lausunnot.html#nro_46
258
259 EN: Opinion 51: European Area of Skills and Qualifications
260 http://www.jukkarannila.fi/lausunnot.html#nro_51
261
262 EN: Opinion 52: Trusted Cloud Europe Survey
263 http://www.jukkarannila.fi/lausunnot.html#nro_52
264
265 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
266 http://www.jukkarannila.fi/lausunnot.html#nro_53
267 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
268
269 EN: Opinion 55: European Energy Regulation
270 http://www.jukkarannila.fi/lausunnot.html#nro_55
271 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
272
273 EN: Opinion 59: Green paper on mobile Health
274 http://www.jukkarannila.fi/lausunnot.html#nro_59
275
276 EN: Opinion 60: Cross-border inheritance tax problems within the EU
277 http://www.jukkarannila.fi/lausunnot.html#nro_60
278
279 EN: Opinion 61: European Register of Products Containing Nanomaterials
280 http://www.jukkarannila.fi/lausunnot.html#nro_61
281
282 EN: Opinion 64: Corporate Social Responsibility - European Commission
283 http://www.jukkarannila.fi/lausunnot.html#nro_64
284
285 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
286 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 287 EN: Opinion 68: European Network Code Stakeholder Committees
288 http://www.jukkarannila.fi/lausunnot.html#nro_68
289 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
290
291 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
292 http://www.jukkarannila.fi/lausunnot.html#nro_71
293 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
294
295 EN: Opinion 74: Enabling the Internet of Things
296 http://www.jukkarannila.fi/lausunnot.html#nro_74
297 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ³
298
299 EN: Opinion 80: Mandatory Transparency Register
300 http://www.jukkarannila.fi/lausunnot.html#nro_80
301
302 EN: Opinion 84: Revision of the European Interoperability Framework
303 http://www.jukkarannila.fi/lausunnot.html#nro_84
304
305 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
306 http://www.jukkarannila.fi/lausunnot.html#nro_86
307
308 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
309 http://www.jukkarannila.fi/lausunnot.html#nro_88
310
311 EN: Opinion 89: BEREC Guidelines for net neutrality rules
312 http://www.jukkarannila.fi/lausunnot.html#nro_89
313 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
314
315 EN: Opinion 93: Safety of apps and other non-embedded software
316 http://www.jukkarannila.fi/lausunnot.html#nro_93
317
318 EN: Opinion 95: Targeted consultation on eForms
319 http://www.jukkarannila.fi/lausunnot.html#nro_95
320
321 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
322 http://www.jukkarannila.fi/lausunnot.html#nro_97
323
324 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
325 http://www.jukkarannila.fi/lausunnot.html#nro_98
326
327 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
328 Regulators. Recast
329 http://www.jukkarannila.fi/lausunnot.html#nro_99
330

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

- 331 EN: Opinion 100: Protection of personal data (EU)
332 http://www.jukkarannila.fi/lausunnot.html#nro_100
333
- 334 EN: Opinion 101: Governance of the Energy Union
335 http://www.jukkarannila.fi/lausunnot.html#nro_101
336
- 337 EN: Opinion 102: Smart Wearables
338 http://www.jukkarannila.fi/lausunnot.html#nro_102
339
- 340 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
341 (ENISA)
342 http://www.jukkarannila.fi/lausunnot.html#nro_106
343
- 344 EN: Opinion 108: Single Digital Gateway
345 http://www.jukkarannila.fi/lausunnot.html#nro_108
346
- 347 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
348 http://www.jukkarannila.fi/lausunnot.html#nro_110
349
- 350 EN: Opinion 111: Interoperability of information systems for migration and security
351 http://www.jukkarannila.fi/lausunnot.html#nro_111
352
- 353 EN: Opinion 113: Transform of health and care
354 http://www.jukkarannila.fi/lausunnot.html#nro_113
355
- 356 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
357 Internet
358 http://www.jukkarannila.fi/lausunnot.html#nro_114
359 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
360
- 361 EN: Opinion 118: Fake news and online disinformation
362 http://www.jukkarannila.fi/lausunnot.html#nro_118
363
- 364 EN: Opinion 119: European Social Security Number
365 http://www.jukkarannila.fi/lausunnot.html#nro_119
366
- 367 EN: Opinion 120: European Labour Authority
368 http://www.jukkarannila.fi/lausunnot.html#nro_120
369
- 370 EN: Opinion 121: 2nd Data Package
371 http://www.jukkarannila.fi/lausunnot.html#nro_121
372
- 373 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
374 Cybersecurity Research and Competence Centre
375 http://www.jukkarannila.fi/lausunnot.html#nro_122

- 376
377 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
378 THE COUNCIL on the re-use of public sector information (recast)
379 http://www.jukkarannila.fi/lausunnot.html#nro_123
380
381 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
382 http://www.jukkarannila.fi/lausunnot.html#nro_125
383
384 EN: Opinion 128: Summertime arrangements
385 http://www.jukkarannila.fi/lausunnot.html#nro_128
386
387 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
388 http://www.jukkarannila.fi/lausunnot.html#nro_129
389
390 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
391 http://www.jukkarannila.fi/lausunnot.html#nro_132
392
393 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
394 ("eForms")
395 http://www.jukkarannila.fi/lausunnot.html#nro_133
396
397 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
398 UCC
399 http://www.jukkarannila.fi/lausunnot.html#nro_134
400
401 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
402 http://www.jukkarannila.fi/lausunnot.html#nro_139
403
404 EN: Opinion 141: Farm Accountancy Data Network
405 http://www.jukkarannila.fi/lausunnot.html#nro_141
406
407 EN: Opinion 142: Horizon Europe (two consultations)
408 http://www.jukkarannila.fi/lausunnot.html#nro_142
409
410 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
411 (evaluation)
412 http://www.jukkarannila.fi/lausunnot.html#nro_144
413
414 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
415 http://www.jukkarannila.fi/lausunnot.html#nro_146
416 NOTE: Organised by the European Committee for Standardization (CEN)
417
418 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
419 http://www.jukkarannila.fi/lausunnot.html#nro_147
420

- 421 EN: Opinion 152: Revision of the Non-Financial Reporting Directive
422 http://www.jukkarannila.fi/lausunnot.html#nro_152
423
- 424 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
425 http://www.jukkarannila.fi/lausunnot.html#nro_154
426
- 427 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
428 2021
429 http://www.jukkarannila.fi/lausunnot.html#nro_156
430
- 431 EN: Opinion 159: EU competition law - market definition notice (evaluation)
432 http://www.jukkarannila.fi/lausunnot.html#nro_159
433
- 434 EN: Opinion 161: New Competition Tool ('NCT')
435 http://www.jukkarannila.fi/lausunnot.html#nro_161
436
- 437 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
438 platforms acting as gatekeepers
439 http://www.jukkarannila.fi/lausunnot.html#nro_162
440
- 441 EN: Opinion 165: Legislative framework for the governance of common European data spaces
442 http://www.jukkarannila.fi/lausunnot.html#nro_165
443
- 444 EN: Opinion 166: Sharing information between national business registers
445 http://www.jukkarannila.fi/lausunnot.html#nro_166
446
- 447 EN: Opinion 167: Interoperable digital public services - European Interoperability Framework
448 evaluation & strategy
449 http://www.jukkarannila.fi/lausunnot.html#nro_167
450
- 451 EN: Opinion 169: Fighting child sexual abuse: detection, removal and reporting of illegal content
452 online
453 http://www.jukkarannila.fi/lausunnot.html#nro_169
454
- 455 EN: Opinion 170: Data sharing in the EU - common European data spaces (new rules)
456 http://www.jukkarannila.fi/lausunnot.html#nro_170
457
- 458 EN: Opinion 172: Guidance on tackling disinformation (update)
459 http://www.jukkarannila.fi/lausunnot.html#nro_172
460
- 461
- 462 [Continues on the next page]

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ANNEX 2

465 DISCLAIMERS

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478

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