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2 TO: Body of European Regulators for Electronic Communications (BEREC)

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5 **BEREC report on the impact of premium content on ECS markets and the effect of devices on**  
6 **the open use of the Internet – BoR (17) 181 – Draft**

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8 First of all, a lot of thanks to Body of European Regulators for Electronic Communications  
9 (BEREC) for organising this important consultation.

10  
11 This opinion represents an opinion of an individual citizen, not any legal entity.

12  
13 This opinion does not contain:  
14 – any business secrets  
15 – any trade secrets  
16 – any confidential information.

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18 This opinion is public.  
19 PDF file of this opinion can be added to a relevant web page

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21  
22 Annex 1 holds information about previous consultations on the European Union level.  
23 Annex 2 holds information about disclaimers and copyright.

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27 Best Regards,

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31 Jukka S. Rannila  
32 citizen of Finland  
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34 signed electronically

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**Framing this opinion: devices and openness of the Internet (Chapter 3 of the draft)**

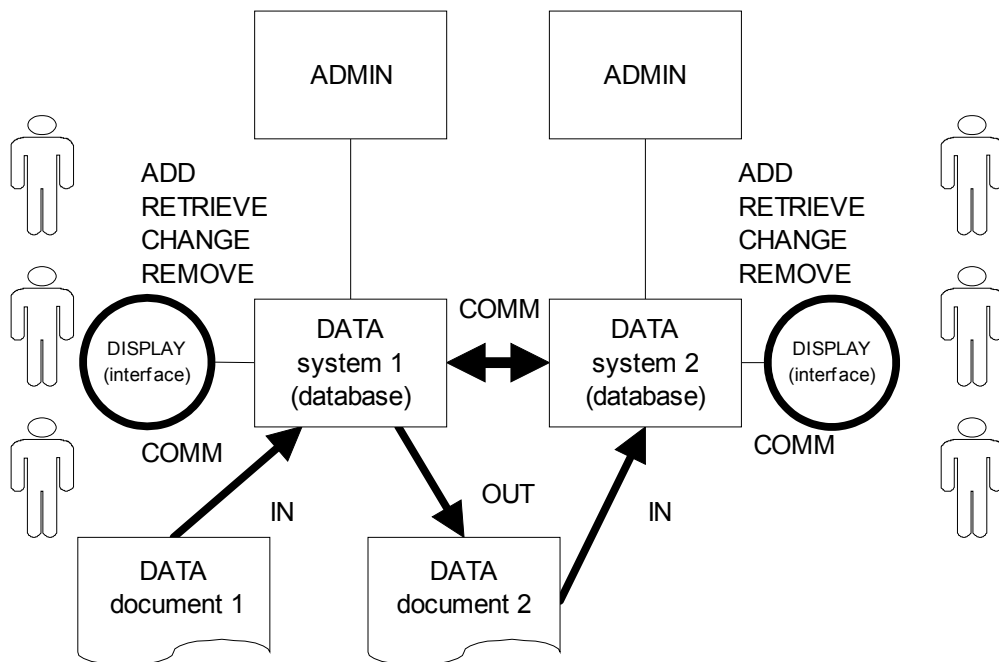
This opinion concentrates mainly on devices and openness of the Internet. Other issues are not handled.

**Possible technical consultations?**

**Proposal: More technically oriented consultations.**

Based on answers (this consultation) there could be more technically oriented consultations. Mentioned issues (this opinion) could be detailed for new technically oriented consultations.

**One presentation of information system**



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Now we can add four basic functions, communication, displays, interfaces, users, documents, data and databases for describing an information system. Like the figure indicates, there are databases in different information systems. Then there are different documents for transmitting data between different systems. Here we can note especially following standardisation needs for different parts of different parts of an information system.

Here we can note several basic issues about documents and databases:

- 65 • four basic functions (add, retrieve, change, remove)
- 66 • administration of a system
- 67 • displays and interfaces
- 68 • direct communication between system (data)
- 69 • transferring documents between systems (data).

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71 Here we can note especially following standardisation needs for different parts of different parts of  
 72 an information system:

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74 From this simple (figure) conception we can differentiate several standard classes:

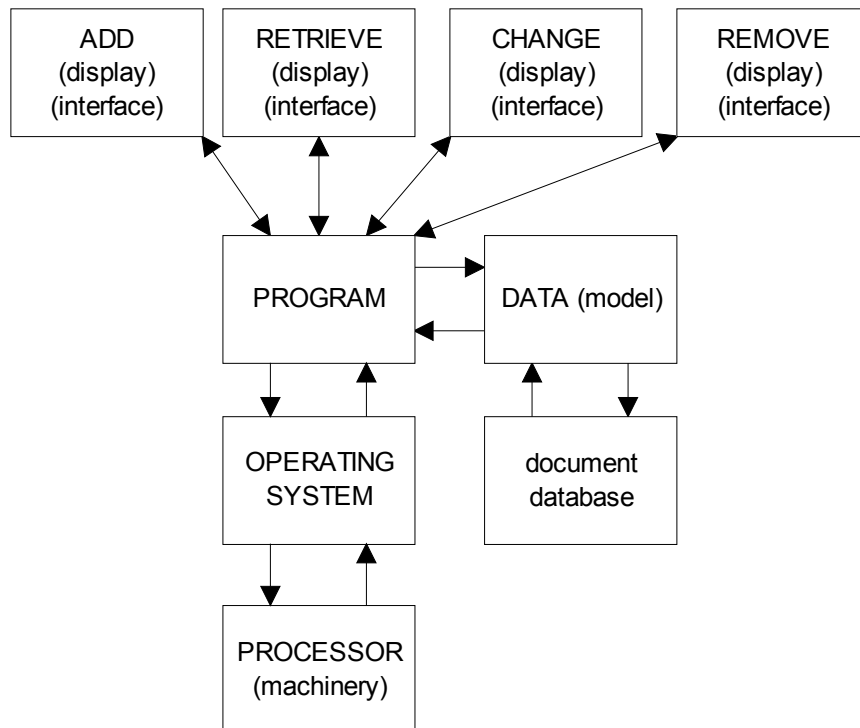
- 75 1) Data (documents) standards
- 76 2) Data (database) standards
- 77 3) Standards for adding data to a system.
- 78 4) Standards for retrieving data from a system.
- 79 5) Standards for changing data in a system.
- 80 6) Standards for removing data from a system.
- 81 7) Display standards
- 82 8) Interface standards
- 83 9) Different communication standards.

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85 **One presentation for information system**

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87 Following figure on the reflection paper is one conception of information system. I have presented  
 88 the following figure as one conception of information system.



89

90 Generally speaking we have different techniques on the information technology field. Here we can  
91 note that programs (most arrows) are in the middle of different information systems. Then programs  
92 handle the data in a system (documents and/or databases). However we have to have one specific  
93 program which is different – i.e. operating system. Operating systems handle connections with  
94 machinery and processors. Generally speaking programs can work with an operating system and  
95 developers of programs use different parts of an operating system.

96

97 **What this means to information systems?**98 **1) There can be several processor (machinery) possibilities**99 **2) There can be several operating systems possibilities**100 **3) There can be several programs possibilities**101 **4) Programs handle data in different ways**102 **5) The data can modelled in different ways**103 **6) There can documents and/or databases in different systems**104 **7) There are always four basic functions (add, retrieve, change, remove).**105 **8) There are several providers of different computer programs.**106 **9) There are naturally competing programs.**107 **10) Different programs comply with different standards.**

108

109 We have to note that data can have different models and data (models) are developed and/or used by  
110 different stakeholders (four basic functions). Especially in databases there are possibilities for  
111 several data models; depending on the modellers there can be different data models in databases.  
112 Generally speaking changing data models can be very difficult in many cases.

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114 **About different standards**

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

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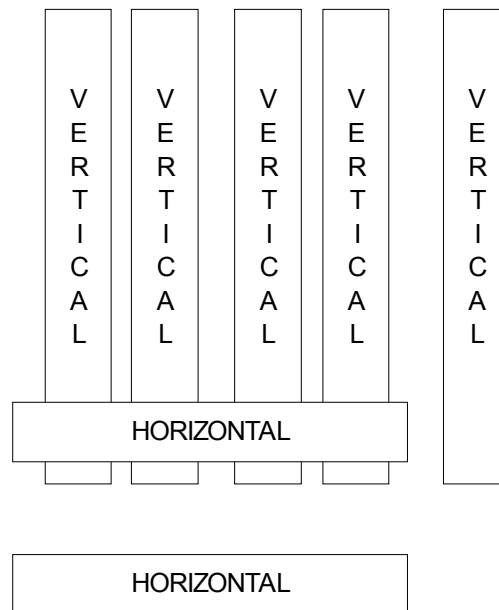
119 **Favouring open standards / Favouring horizontal standards**

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126 There are differences between horizontal and vertical standards. A simple example is naturally  
127 email solutions. There are several vertical standards when creating technically email solutions. Then  
128 there are horizontal standards which enable sending messages between technically different email  
129 solutions.

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

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133 **Proposal: Using horizontal standards could be favoured when creating different**  
134 **information systems.**

135

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

138

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

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

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143 **Proposal: There could be different standardisation efforts to horizontal standards and**  
144 **vertical standards.**

145

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

148

149 Here we can note some problems:

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151

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

163

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

168

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

175

176 There are different standards setting organisations on the information technology field. One list <sup>1</sup> of  
177 these standards setting organisations is provided by ConsortiumInfo.org.

178

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

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

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

188

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

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

193

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

1 Standard Setting Organizations and Standards List, [www.consortiuminfo.org/links/linksall.php](http://www.consortiuminfo.org/links/linksall.php)

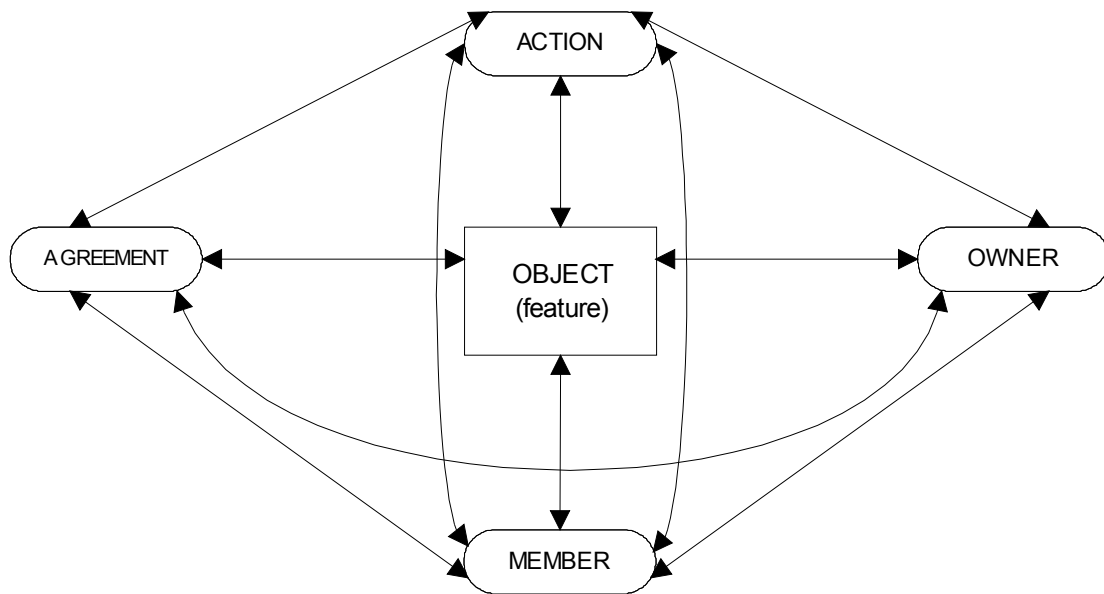
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**Proposal: Government agencies could financially support development of horizontal standards.**

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

**There can be some examples:**

- a) There could be some regulations for providing interfaces (private, public)
- b) There could be some regulations for document formats (private, public)
- c) There could be some regulations for transmitting data between different systems
- d) There could be some regulations for using databases (private, public)
- e) There could be some regulations for using programs (private, public)
- f) There could be some regulations for retrieving information from different systems.



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

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

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

225

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

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

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**Proposal: There could be some considerations for assessing possible / future changes in ownerships, agreements and memberships.**

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#### **Assessing regularly current market situation**

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Following text is presented on the consultation document:

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More generally, a close cooperation with the various relevant regulatory authorities, notably competition authorities, would be advisable, in particular if some of the risks mentioned above were to materialise. (page 33)

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**Proposal: BEREC could organise regular assessments of market situation– e.g. yearly basis.**

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**Proposal: Based on these regular assessments there could be some cooperation with different competition authorities and BEREC – e.g. with the European Commission (Directorate-General for Competition).**

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**Proposal: Part of assessments of current market situation could be based on usage of**



249 **different standards – i.e. private standards and open standards.**

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251 **Cooperation with different actors on different application fields**

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253 Following text is presented on the consultation document:

254

255 The effectiveness of such monitoring, where it is deemed appropriate to implement, relies on  
256 the ability of the authority to collect the necessary data, as well as manage the resources  
257 needed for its analysis. (page 33)

258

259 **Proposal: BEREC could collect an extensive list of different actors on different**  
260 **application fields.**

261

262 **Proposal: Based on this extensive list there could be targeted consultations for different**  
263 **actors on different application fields.**

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265 **Note: There can be several new actors in the future and these new actors can**  
266 **shake current market situation.**

267

268 **Standardisation on several layers**

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270 Following text is presented on the consultation document:

271

272 However, in the chain that connects end-users to Internet content, information and  
273 applications, there are several other essential links. (page 24)

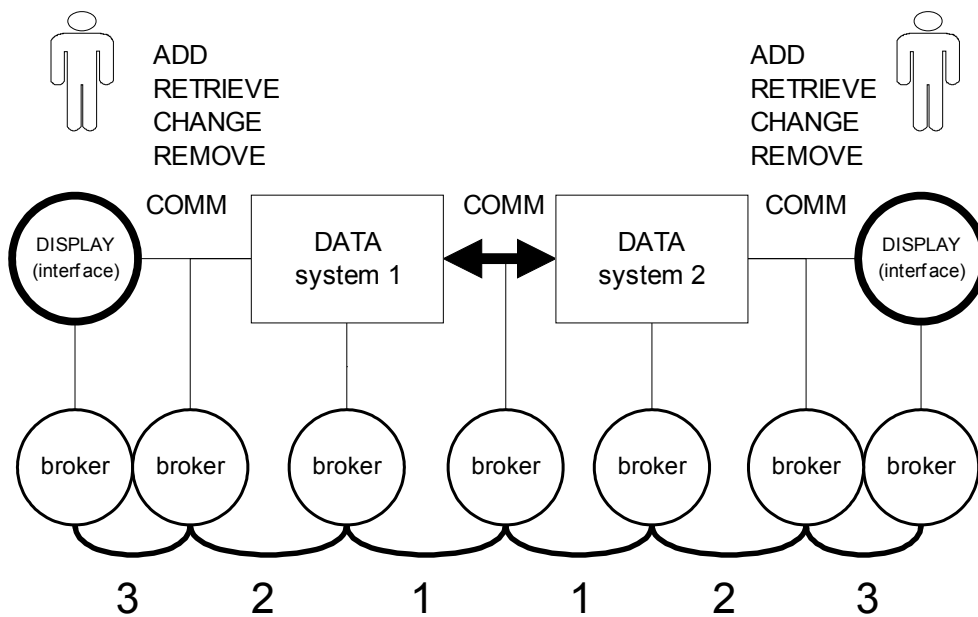
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275 Here we can not that there can be different brokers (or trusted third parties) which are user between  
276 different systems. Here we can note that there can be several standards when there is cooperation  
277 between different systems.

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279 [Continues on the next page]

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**Proposal: (Repetition) There could be some assessments of standardisation on several layers.**

**Proposal: Different brokers could be assessed as part of previously mentioned assessments.**

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



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I have advocated usage of web feeds on several previous opinion documents. Actually there are two standards for web feeds: RSS<sup>2 3</sup> and Atom<sup>4 5 6</sup>.

**Proposal: Web feeds 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).**

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

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

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

307  
308           It can be easier to create web feeds in different information systems since web feeds enable  
309           connections without direct system-to-system connections.

310  
311           It can be noted, that different back-office systems (with a wide variety of different technologies) can  
312           implement RSS standards, and these RSS feeds can be used in the front-office systems. With this  
313           kind solutions front-office systems don't need direct system-to-system communications with back-  
314           office systems.

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317           **Good luck!!!**

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

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323           [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](http://www.jukkarannila.fi/lausunnot.html#nro_1)

EN: Opinion 2: Schools for the 21st Century  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_2](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](http://www.jukkarannila.fi/lausunnot.html#nro_3)

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_5](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](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_9)

EN: Opinion 15: Collective Redress  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_15](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_18)

EN: Opinion 19: Official Acknowledgement by the Commission  
[http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)

- 370 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
371 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
372
- 373 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
374 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
375
- 376 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
377 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
378
- 379 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
380 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
381
- 382 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
383 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
384
- 385 EN: Opinion 30: Internet Filtering  
386 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
387 NOTE: Organised by the European Committee for Standardization (CEN) <sup>7</sup>  
388
- 389 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
390 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
391
- 392 EN: Opinion 34: REMIT Registration Format  
393 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
394 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>8</sup>  
395
- 396 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
397 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
398
- 399 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
400 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
401
- 402 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
403 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
404
- 405 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
406 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
407
- 408 EN: Opinion 41: AT.39398: observations on the proposed commitments  
409 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
410
- 411 EN: Opinion 42: Opening up Education  
412 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)

<sup>7</sup> <http://www.cen.eu/> (Accessed 2 July 2012)

<sup>8</sup> <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 413  
414 EN: Opinion 43: Publication of extracts of the European register of market participants  
415 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
416 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
417  
418 EN: Opinion 44: Evaluation policy guidelines  
419 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
420  
421 EN: Opinion 45: About ICT standardisation  
422 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
423  
424 EN: Opinion 46: Review of the EU copyright rules  
425 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
426  
427 EN: Opinion 51: European Area of Skills and Qualifications  
428 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
429  
430 EN: Opinion 52: Trusted Cloud Europe Survey  
431 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
432  
433 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
434 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
435 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
436  
437 EN: Opinion 55: European Energy Regulation  
438 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
439 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
440  
441 EN: Opinion 59: Green paper on mobile Health  
442 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
443  
444 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
445 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
446  
447 EN: Opinion 61: European Register of Products Containing Nanomaterials  
448 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
449  
450 EN: Opinion 64: Corporate Social Responsibility - European Commission  
451 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
452  
453 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
454 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
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- 458 EN: Opinion 68: European Network Code Stakeholder Committees  
459 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
460 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
461  
462 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
463 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
464 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
465  
466 EN: Opinion 74: Enabling the Internet of Things  
467 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
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479 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
480 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
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482 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
483 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
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486 EN: Opinion 93: Safety of apps and other non-embedded software  
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<sup>9</sup> <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

502

503 EN: Opinion 100: Protection of personal data (EU)

504 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)

505

506 EN: Opinion 101: Governance of the Energy Union

507 [http://www.jukkarannila.fi/lausunnot.html#nro\\_101](http://www.jukkarannila.fi/lausunnot.html#nro_101)

508

509 EN: Opinion 102: Smart Wearables

510 [http://www.jukkarannila.fi/lausunnot.html#nro\\_102](http://www.jukkarannila.fi/lausunnot.html#nro_102)

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512 EN: Opinion 106: Review of the European Union Agency for Network and Information Security  
513 (ENISA)514 [http://www.jukkarannila.fi/lausunnot.html#nro\\_106](http://www.jukkarannila.fi/lausunnot.html#nro_106)

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516 EN: Opinion 108: Single Digital Gateway

517 [http://www.jukkarannila.fi/lausunnot.html#nro\\_108](http://www.jukkarannila.fi/lausunnot.html#nro_108)

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519 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code

520 [http://www.jukkarannila.fi/lausunnot.html#nro\\_110](http://www.jukkarannila.fi/lausunnot.html#nro_110)

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522 EN: Opinion 111: Interoperability of information systems for migration and security

523 [http://www.jukkarannila.fi/lausunnot.html#nro\\_111](http://www.jukkarannila.fi/lausunnot.html#nro_111)

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525 EN: Opinion 113: Transform of health and care

526 [http://www.jukkarannila.fi/lausunnot.html#nro\\_113](http://www.jukkarannila.fi/lausunnot.html#nro_113)

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530 My opinions to the previous and relevant consultations – there consultations were mostly organised  
531 by the European Commission. General page to all consultations – both in English and in Finnish:532 <http://www.jukkarannila.fi/lausunnot.html>

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535 [Continues on the next page]

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