

1

2 TO: European Commission

3

4 **Review of the European Union Agency for Network and Information Security (ENISA)**

5

6 First of all, a lot of thanks to European Commission for organising this important consultation.

7

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

9

10 This opinion does not contain:

11 – any business secrets

12 – any trade secrets

13 – any confidential information.

14

15 This opinion is public.

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

17

18 Annex 1 holds information about previous consultations on the European Union level.

19 Annex 2 holds information about disclaimers and copyright.

20

21

22

23 Best Regards,

24

25

26

27 Jukka S. Rannila

28 citizen of Finland

29

30 signed electronically

31

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33 [Continues on the next page]

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35

36 **Many issues are repeated based on previous consultations**

37

38 Annex 1 holds information about previous consultations. Here we can note that many issues have
39 been repeated. For this consultation (Review of the European Union Agency for Network and
40 Information Security (ENISA)) we can highlight some issues based on previous consultations.

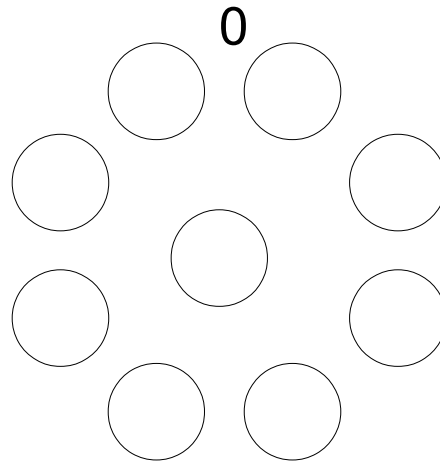
41

42 **Possible reality / Several systems without connections to other systems**

43

44 The current reality (0) is that there can several systems which are not connected to other systems.
45 However in the future there can be several ways for cooperation between systems. The problem in
46 the future may be very complex system-to-system (1) connections.

47



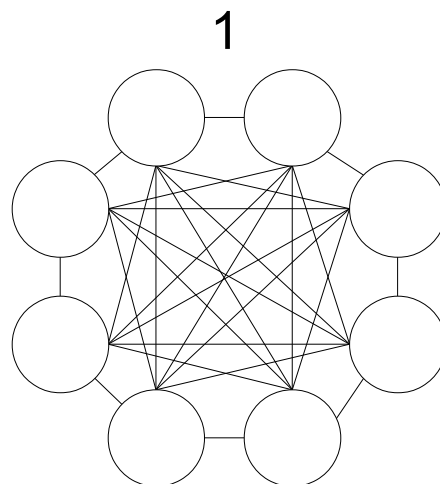
48

49 **Possible reality: Several systems without connections**

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51 **Possible future: Very complex system-to-system relations and/or several connections**

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53

Possible future: Very complex system-to-system relations and/or several connections

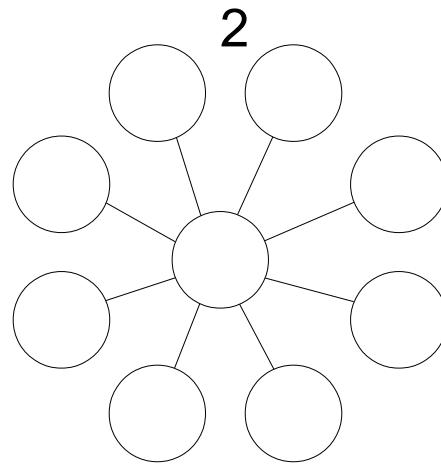
54

55 Generally speaking these many-to-many connections can work quite well when there are not
56 changes in different systems. The problem arises when there are changes in one system since one
57 change can affect several other systems.

58

59 Based this problem there are in many cases one central system (2) which can handle cooperation
60 between different (sub)systems. The problem with this option is the failure of the central system and
61 this can lead to unwanted outage of several (sub)systems.

62



One central system

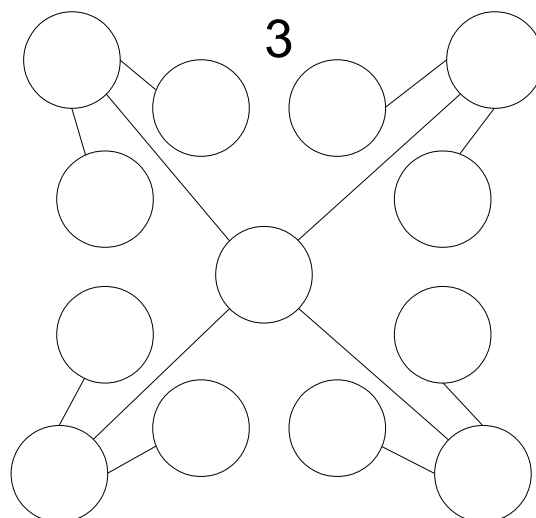
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66 One option (3) is to have a hierarchy between different system. In this way there cab some systems
67 which are not connected to the central system. With this approach not all (sub)systems face the
68 same problem with a failure in the central system.

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70

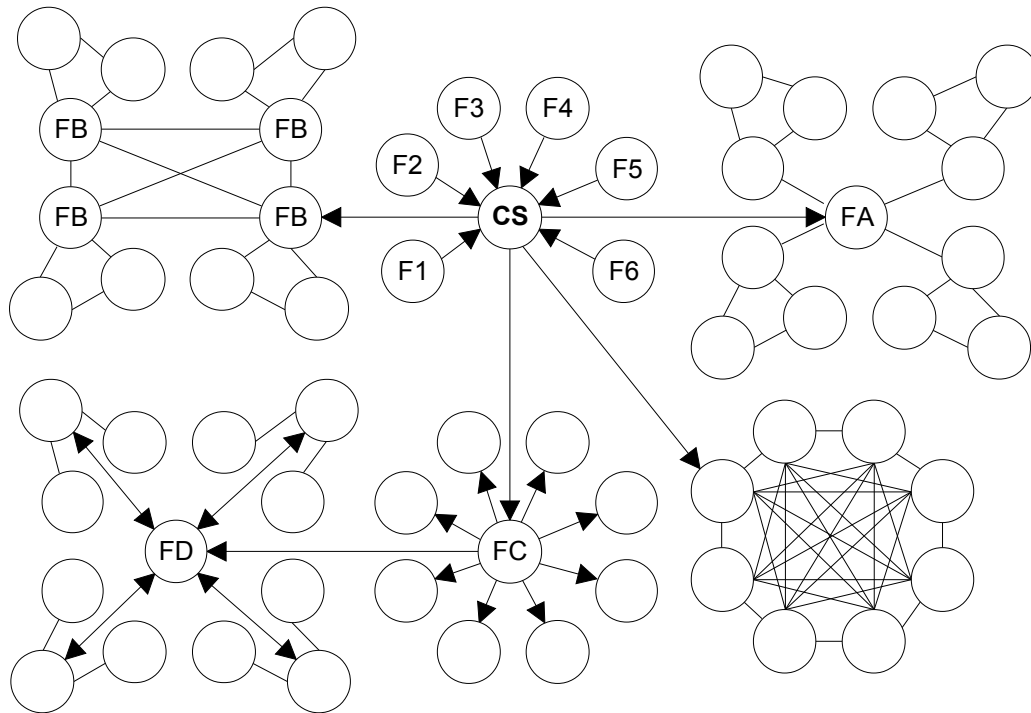
71

Possible future: Some systems are organised into a hierarchical structure

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Complex networks of different systems?

The reality: There will be several layered systems developed by several stakeholder communities (both for-profit and non-profit communities).



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Here we can note that there can some central systems (CS) and information from those central systems can be distributed to several other systems. In reality the added value for users (citizens and different legal entities) is achieved by combining different systems to provide different services.

We can note that there can several formats (e.g. 1-6, A-D) for transmitting information from some central (CS) information system. Some formats may be non-standard or standard.

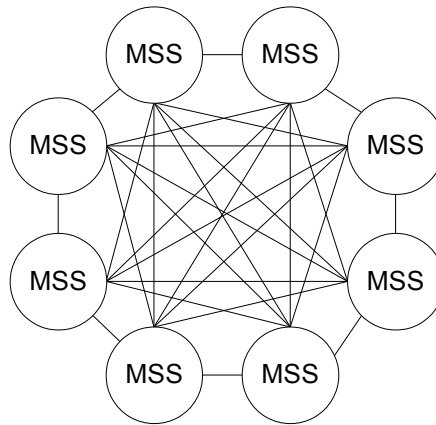
Proposal: There could be some efforts for developing some central systems.

The practical reality is that there will be several central systems – not all-powerful one central system.

Proposal: There could be some efforts for standardising different central systems.

Complexity on the European Union level

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MSS = Member State System

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100 There are 28 member states (European Union) at the moment. In reality there are unique situations
101 with information systems in different member states. In some cases information systems can be
102 implemented based on complex system-to-system connections. Complex system-to-system
103 connections means a lot of work when there are changes in some systems.

104

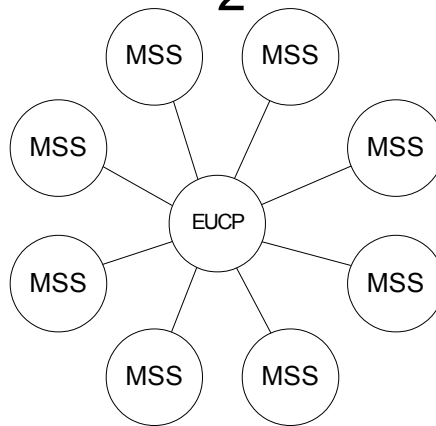
**Proposal: Complex system-to-system connections implemented in information systems
could be assessed carefully.**

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2



MSS = Member State System
EUCP = European Contact Point

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112 One option is to have a single European contact point for member state systems. Here we can
113 calculate connections based on number of information systems.

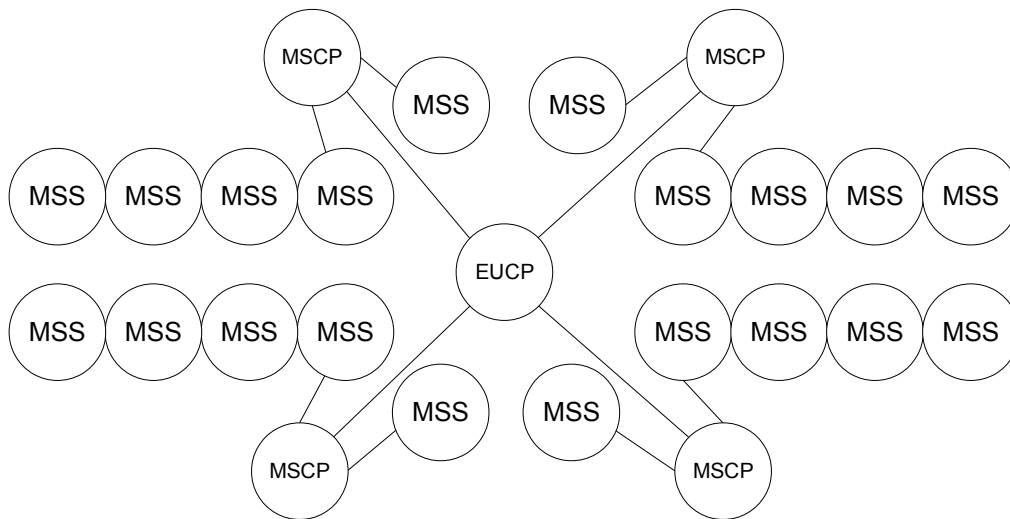
114

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- 116 1 x 28 member state systems = 28 systems
- 117 5 x 28 member state systems = 140 systems
- 118 10 x 28 member state systems = 280 systems
- 119 15 x 28 member state systems = 420 systems
- 120 20 x 28 member state systems = 560 systems.
- 121 28 x 30 member state systems = 840 systems

123 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 124 there can be member state contact points (MCP). Then there can be some hierarchy between
 125 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS). There are unique situations with member
 126 statesystems in member states. Therefore member state contact points (MCP) can reduce the
 127 complexity with European Union contact point (EUCP).
 128

3



129 **MSS = Member State System, MSCP = Member State Contact Point,**
 130 **EUCP = European Contact Point**
 131
 132

133 Based on those calculations there could be a lot of direct connections to the European contact point.
 134 Number of those connections can be overwhelming. The situation between member states can vary
 135 in many ways. So there can different and unique systems between member states.

136
 137 I have proposed several times creation of member state contact points which could handle different
 138 system-to-system connections on member state level. Then it can be easier to create connections
 139 between member state contact points and European contact point.

140
 141 **Proposal : There could be one information system (member state contact point) on**
 142 **member state level.**

143
 144 **Proposal: Different member state systems could be consolidated based on limited**

145 **number system-to-system connections.**

146

147 **Proposal: One information system (member state contact point) on member state level**
148 **could handle system-to-system connections on the European Union level (European**
149 **contact point).**

150

151 **Possible global connections**

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153 Here we can note that there can be global contact point for different issues.

154

155 **Proposal: There could be assessments about global contact points for different issues.**

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157 **Proposal: There could be assessments about cooperation between global contact**
158 **point(s) and European contact point(s).**

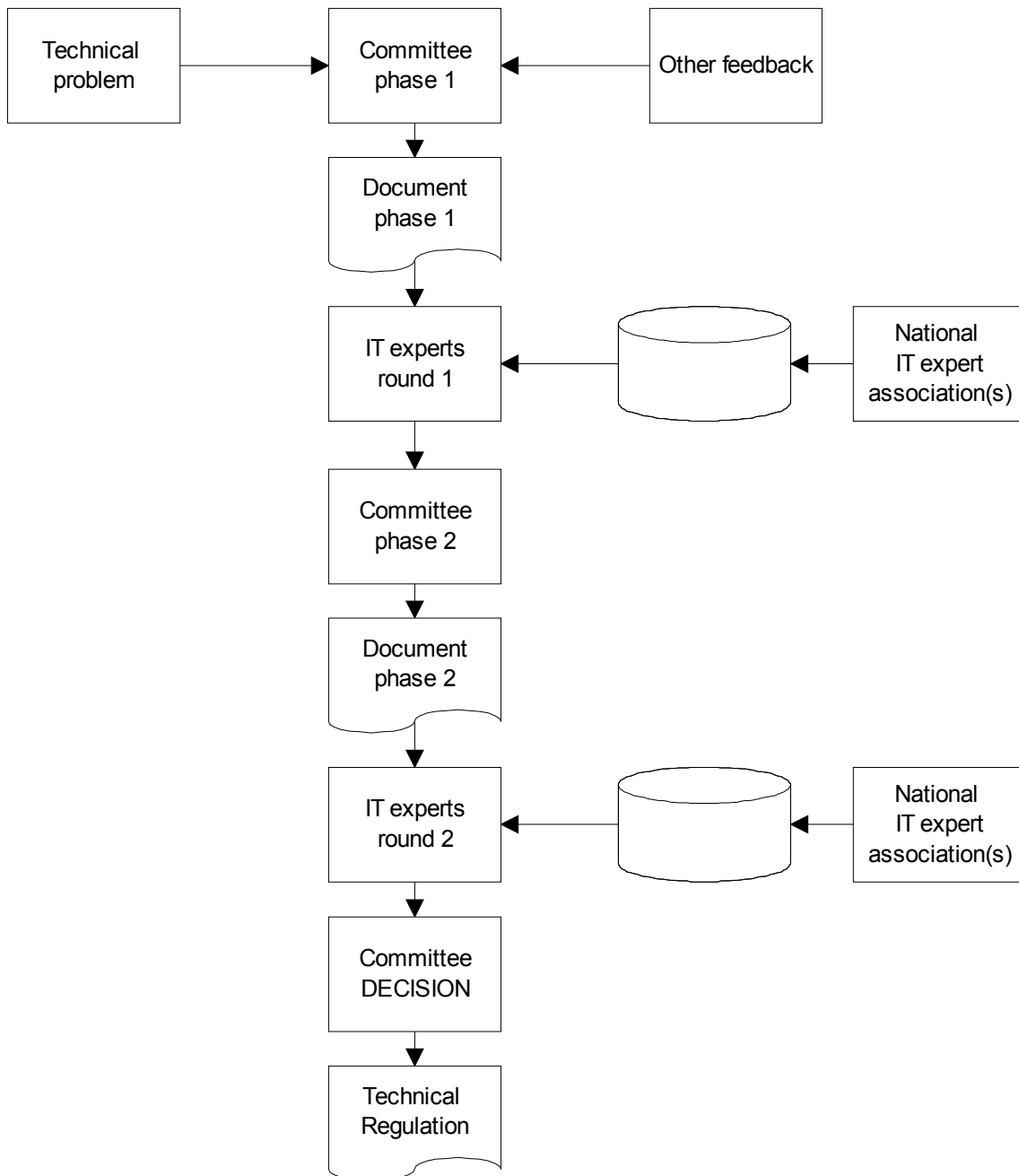
159

160 In reality there are several information systems related to global security issues. Consolidating with
161 different global systems means some practical efforts on the European Union level.

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163 [Continues on the next page]

164



165

166

167 Based on previous opinions a process model for technical consultations can be presented. It could
 168 be possible to inform members of different (national) information technology experts associations
 169 about different technical consultations. There can different technical problems when developing
 170 different information systems.

171

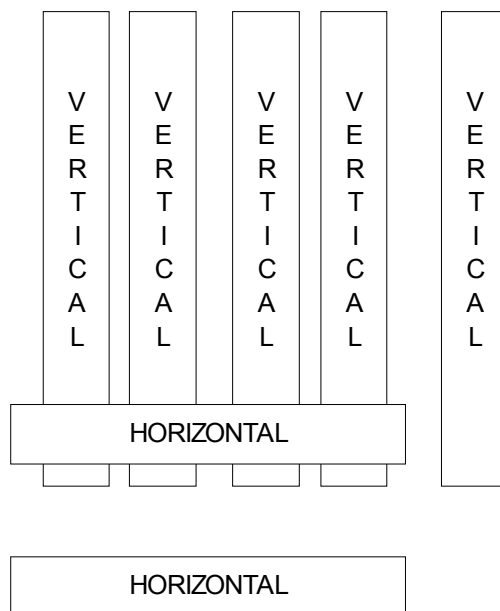
172 **Proposal: Members of different (national) information technology experts associations**
 173 **could be informed about different consultations based on different technical problems**

174 **when developing different (public sector) information systems.**

175

176 **Favouring open standards / Favouring horizontal standards**

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178

179

180 There are differences between horizontal and vertical standards. A simple example is naturally
 181 email solutions. There are several vertical standards when creating technically email solutions. Then
 182 there are horizontal standards which enable sending messages between technically different email
 183 solutions.

184

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

186

187 **Proposal: Using horizontal standards could be favoured when creating different
 188 information systems on the European Union level.**

189

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

192

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

194

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

196

197 **Proposal: There could be different standardisation efforts to horizontal standards and
 198 vertical standards.**

199

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

- 202
203 Here we can note some problems:
204
- 205 • some systems are based on **de-facto** standards
 - 206 • some systems are based on **de-jure** standards
 - 207 • there can be confrontations between **de-facto** and **de-jure** standards
 - 208 • there can be a monopoly situation in some domain
 - 209 • some standards may inhibit possible actions of some stakeholders
 - 210 • there can be a standard war on some domains
 - 211 • standards have different life-cycles
 - 212 • systems have different life-cycles
 - 213 • there can be mismatches between different life-cycles
 - 214 • there can be failed standards
 - 215 • there can be deprecated standards.

216
217 It is quite normal situation in the information technology field that there are competing standards
218 for some application field. Therefore there are all the time ongoing “standards wars” or “format
219 wars”. The information technology standards tend to be interrelated and one “standards war” or
220 “format war” can lead to another similar situation.

221
222 I have advocated open standards even though in some cases open standards are not de facto
223 standards. In practice public sector has very important role, when some standards are competing in
224 the market place. Because public sector has a considerable power when buying/developing
225 information systems and therefore public sector can sometimes direct markets to certain standards.
226 Therefore there should be serious vigilance when assessing different standards and “standards” in
227 some application fields.

228 229 **An example for cooperation: Web feeds (RSS and Atom)**

230



231
232
233 I have advocated usage of web feeds on several previous opinion documents.

234

235 **Proposal: Web feeds could be advocated when developing different informations**
236 **systems.**

237

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

240

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

244

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

246

247 Actually there are two standards for web feeds: RSS ^{1 2} and ^{3 4 5} Atom.

248

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

251

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

256

257 **Some final notes**

258

259 Different activities of European Union Agency for Network and Information Security (ENISA) can
260 be seriously reviewed.

261

262 Based on previous opinions and proposals there can be well-defined roles for ENISA for advancing
263 information security on the European Union level.

264

265

266

267 **Good luck!!!**

268

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

1 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

2 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

3 [https://en.wikipedia.org/wiki/Atom_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

4 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

5 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

271

ANNEX 1

272

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

276

277

278 My opinions to the previous and relevant consultations – there consultations were mostly organised
279 by the European Commission.

280

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

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

283

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

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

286

287 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
288 Safe and Innovative medicines

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

290

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

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

293

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

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

296

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

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

299

300 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
301 proposal for comments

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

303

304 EN: Opinion 15: Collective Redress

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

306

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

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

309

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

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

312

313 EN: Opinion 19: Official Acknowledgement by the Commission

314 http://www.jukkarannila.fi/lausunnot.html#nro_19

315

- 316 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
317 http://www.jukkarannila.fi/lausunnot.html#nro_20
318
- 319 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
320 http://www.jukkarannila.fi/lausunnot.html#nro_21
321
- 322 EN: Opinion 23: Public consultation on the review of the European Standardisation System
323 http://www.jukkarannila.fi/lausunnot.html#nro_23
324
- 325 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
326 http://www.jukkarannila.fi/lausunnot.html#nro_27
327
- 328 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
329 http://www.jukkarannila.fi/lausunnot.html#nro_28
330
- 331 EN: Opinion 30: Internet Filtering
332 http://www.jukkarannila.fi/lausunnot.html#nro_30
333 NOTE: Organised by the European Committee for Standardization (CEN) ⁶
334
- 335 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
336 http://www.jukkarannila.fi/lausunnot.html#nro_32
337
- 338 EN: Opinion 34: REMIT Registration Format
339 http://www.jukkarannila.fi/lausunnot.html#nro_34
340 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁷
341
- 342 EN: Opinion 35: Exploiting the employment potential of the personal and household services
343 http://www.jukkarannila.fi/lausunnot.html#nro_35
344
- 345 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
346 http://www.jukkarannila.fi/lausunnot.html#nro_37
347
- 348 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
349 http://www.jukkarannila.fi/lausunnot.html#nro_39
350
- 351 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
352 http://www.jukkarannila.fi/lausunnot.html#nro_40
353
- 354 EN: Opinion 41: AT.39398: observations on the proposed commitments
355 http://www.jukkarannila.fi/lausunnot.html#nro_41
356
- 357 EN: Opinion 42: Opening up Education
358 http://www.jukkarannila.fi/lausunnot.html#nro_42

⁶ <http://www.cen.eu/> (Accessed 2 July 2012)

⁷ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 359
360 EN: Opinion 43: Publication of extracts of the European register of market participants
361 http://www.jukkarannila.fi/lausunnot.html#nro_43
362 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
363
364 EN: Opinion 44: Evaluation policy guidelines
365 http://www.jukkarannila.fi/lausunnot.html#nro_44
366
367 EN: Opinion 45: About ICT standardisation
368 http://www.jukkarannila.fi/lausunnot.html#nro_45
369
370 EN: Opinion 46: Review of the EU copyright rules
371 http://www.jukkarannila.fi/lausunnot.html#nro_46
372
373 EN: Opinion 51: European Area of Skills and Qualifications
374 http://www.jukkarannila.fi/lausunnot.html#nro_51
375
376 EN: Opinion 52: Trusted Cloud Europe Survey
377 http://www.jukkarannila.fi/lausunnot.html#nro_52
378
379 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
380 http://www.jukkarannila.fi/lausunnot.html#nro_53
381 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
382
383 EN: Opinion 55: European Energy Regulation
384 http://www.jukkarannila.fi/lausunnot.html#nro_55
385 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
386
387 EN: Opinion 59: Green paper on mobile Health
388 http://www.jukkarannila.fi/lausunnot.html#nro_59
389
390 EN: Opinion 60: Cross-border inheritance tax problems within the EU
391 http://www.jukkarannila.fi/lausunnot.html#nro_60
392
393 EN: Opinion 61: European Register of Products Containing Nanomaterials
394 http://www.jukkarannila.fi/lausunnot.html#nro_61
395
396 EN: Opinion 64: Corporate Social Responsibility - European Commission
397 http://www.jukkarannila.fi/lausunnot.html#nro_64
398
399 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
400 http://www.jukkarannila.fi/lausunnot.html#nro_66
401
402
403

- 404 EN: Opinion 68: European Network Code Stakeholder Committees
405 http://www.jukkarannila.fi/lausunnot.html#nro_68
406 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
407
- 408 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
409 http://www.jukkarannila.fi/lausunnot.html#nro_71
410 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
411
- 412 EN: Opinion 74: Enabling the Internet of Things
413 http://www.jukkarannila.fi/lausunnot.html#nro_74
414 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁸
415
- 416 EN: Opinion 80: Mandatory Transparency Register
417 http://www.jukkarannila.fi/lausunnot.html#nro_80
418
- 419 EN: Opinion 84: Revision of the European Interoperability Framework
420 http://www.jukkarannila.fi/lausunnot.html#nro_84
421
- 422 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
423 http://www.jukkarannila.fi/lausunnot.html#nro_86
424
- 425 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
426 http://www.jukkarannila.fi/lausunnot.html#nro_88
427
- 428 EN: Opinion 89: BEREC Guidelines for net neutrality rules
429 http://www.jukkarannila.fi/lausunnot.html#nro_89
430 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
431
- 432 EN: Opinion 93: Safety of apps and other non-embedded software
433 http://www.jukkarannila.fi/lausunnot.html#nro_93
434
- 435 EN: Opinion 95: Targeted consultation on eForms
436 http://www.jukkarannila.fi/lausunnot.html#nro_95
437
- 438 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
439 http://www.jukkarannila.fi/lausunnot.html#nro_97
440
- 441 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
442 http://www.jukkarannila.fi/lausunnot.html#nro_98
443
- 444 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
445 Regulators. Recast
446 http://www.jukkarannila.fi/lausunnot.html#nro_99
447

⁸ <http://www.berec.europa.eu>, BEREC

448

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

450 http://www.jukkarannila.fi/lausunnot.html#nro_100

451

452 EN: Opinion 101: Governance of the Energy Union

453 http://www.jukkarannila.fi/lausunnot.html#nro_101

454

455 EN: Opinion 102: Smart Wearables

456 http://www.jukkarannila.fi/lausunnot.html#nro_102

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479

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507

508

509



9 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three "old" parties were not traditionally as the three largest parties. On 2015 this "new" party is part of the current Finnish Government. We all must be interested about this new development in Finland.