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TO: European Commission

EU customs procedures – developing and upgrading electronic systems

First of all, a lot of thanks to European Commission 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 disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

36

37 **About previous consultations / Repeating several issues**

38

39 Annex 1 holds information about previous consultations. I have repeated the same issues several
 40 times and previous consultation documents can be assessed critically. Different units of the
 41 European Commission already know something about my previous opinions.

42

43 **Many proposals already implemented**

44

45 This opinion does not list all possible issues based on previous consultations since several issues are
 46 already mentioned on the COMMISSION IMPLEMENTING DECISION (EU) draft (Ref.
 47 Ares(2019)6019567 – 27/09/2019).

48

49 **National systems and trans-European systems**

50

51 On the page 3 of the draft document is following text:

52

53 **The work programme should distinguish between the electronic systems that the**
 54 **Member States are to develop themselves (‘national systems’) and those that they are**
 55 **to develop in cooperation with the Commission (‘trans-European systems’).**

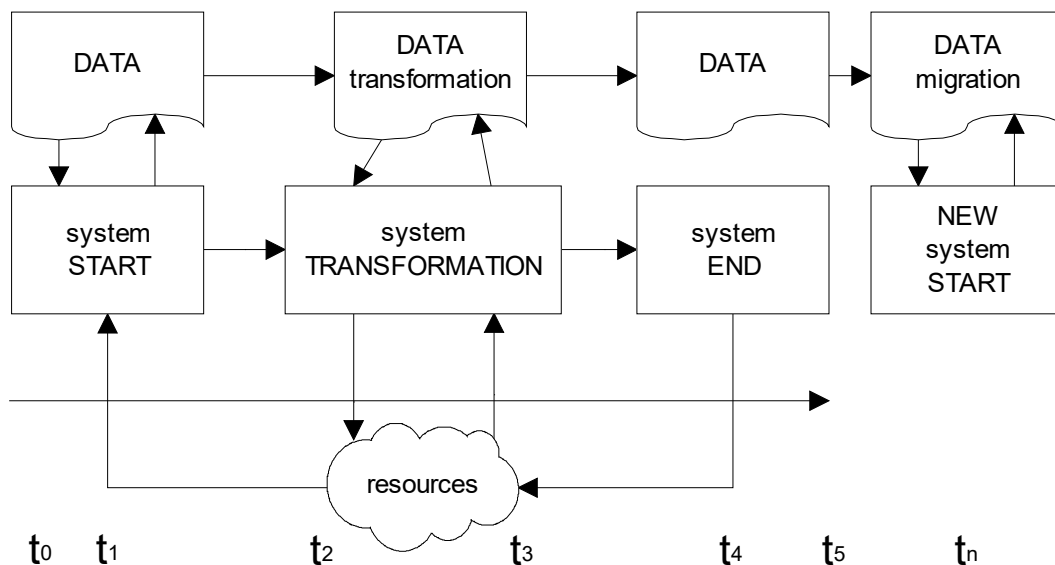
56

57 Here can be noted that there are several issues to be assessed when creating national systems and
 58 trans-European systems.

59

60 **System timeline – national systems**

61

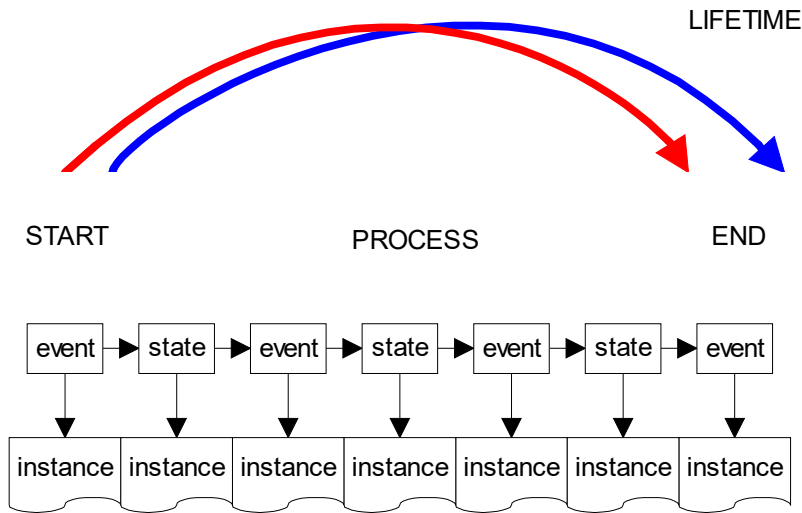


62

63

64 **Proposal: Different information systems (EU-wide systems and member state systems)**
 65 **could be assessed based on *informations system lifetime*.**

66
67 **Start, end, events and lifetime**



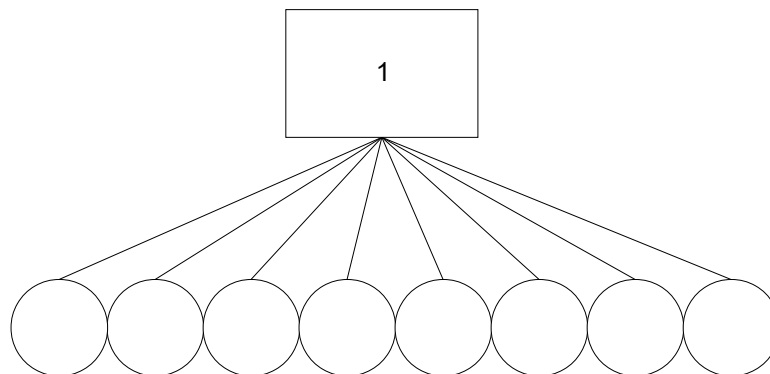
69
70
71 Information systems contains information about events and states which means different processes
72 during the lifetime of a system. Like mentioned before different systems can be assessed based on
73 lifetime.

74
75 **Assessing different application programming interface (APIS)**

76
77 There can be several APIs implemented in different information system. The natural problem with
78 APIs is timeline of different systems which implement different APIs. There can be new and old
79 systems which implement different APIs.

80
81 **Proposal: Different information systems (EU-wide systems and member state systems)**
82 **could be assessed based on implementation of different APIs.**

83
84 Here can be noted that there can several APIs implemented in different information systems.



85
86
Copyright, licence and disclaimers: check Annex 2.

87

88 One issue can be different versions of APIs. Based on timelines of different systems there can be
89 different API versions in use.

90

91 **Proposal: Different API versions could be assessed very carefully.**

92

93 Based on previous issues it can be noted that in some cases an older system can implement only
94 some versions of different APIs.

95

96 **About different identifiers (ID)**

97

98 Developing a standardised member state contact point (MSCP) means some work to be done. Here
99 we can note that there will be several *identifiers* when developing new systems and maintaining
100 current systems (EUCP ↔ MSCP).

101

102 I have proposed several times to use *open and public identifiers* when developing different
103 information system.

104

105 **More and more new identifiers (ID)**

106

107 In previous consultations there has been discussion about different identifiers (ID) in different
108 information systems. It can be noted from the previous opinions that there will be several and
109 different identifiers (ID) for different levels.

110

111 Examples of these identifiers (ID) are following:

112

- 113 1) Facebook ID for an individual person
- 114 2) Facebook ID for the individual updates of individuals
- 115 3) Data Universal Numbering System (D-U-N-S)
- 116 4) Reuters instruments codes (RICs)
- 117 5) Social security code for individual citizens in the European Union member states
- 118 6) Business identity code for a company in an European Union member state
- 119 7) Value added tax code for a company in an European Union member state.

120

121 The examples of private identifiers (Facebook IDs, Data Universal Numbering System (D-U-N-S),
122 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
123 of using identifiers (ID) from privately owned information systems.

124

125 **Proposal: There could be a systematic review of different identifiers (ID) on different
126 levels.**

127

128 **Proposal: Possible systematic review of different identifiers (ID) should assess different
129 situations.**

130

131 Different information systems have also internal identifiers (ID) and external identifiers (ID) for

132 (possible) public usage. The added value for different stakeholders is provided by combination of
 133 different identifiers (ID) in a specific information system.

134

135 **Proposal: There could be some assessment(s) based on different versions of different**
 136 **identifiers (ID).**

137

138 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
 139 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
 140 (ID), but this consolidation means some serious technical and administrative actions.

141

142 **Proposal: Legacy identifiers (ID) could be assessed seriously.**

143

144 When information about relevant identifiers is collected, there could be a serious assessment of
 145 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
 146 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

147

148 **Proposal: The nature of different identifiers (ID) could be assessed.**

149

150 **Proposal: There could be serious negotiations with some providers of identifiers (ID).**

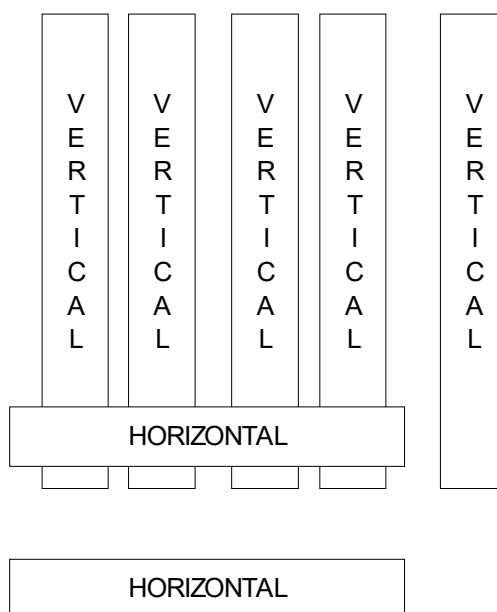
151

152 In the European Union there has been different anti-trust cases which are related to different private
 153 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
 154 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

155

156 **Horizontal and vertical technologies – generally**

157



158

159

160 There are differences between horizontal and vertical technologies. A simple example is naturally
 161 email solutions. There are several vertical technologies when creating technically email solutions.
 162 Then there are horizontal technologies which enable sending messages between technically
 163 different email solutions.

164
 165 **Proposal: Horizontal technologies should be favoured when developing different**
 166 **technologies.**

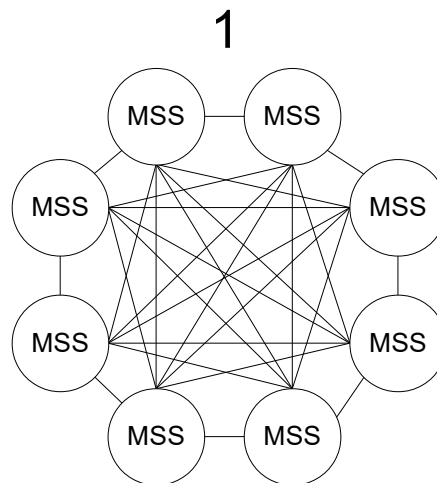
167
 168 **Horizontal and vertical software**

169
 170 Software can be developed both vertically and horizontally.

171
 172 **Proposal: Horizontal software should be favoured when developing and/or researching**
 173 **different technologies.**

174
 175 **EU-wide level?**

176
 177 I have noted several times that different member state systems (MSS) can interlinked in many ways.
 178 This means that co-operation with European Union systems means a lot of work. This leads to the
 179 question of a European Contact Point (EUCP) for different member state systems (MSS).
 180



MSS = Member State System

181
 182
 183
 184 There are 28 member states (European Union) at the moment. In reality there are unique situations
 185 with information systems in different member states. In some cases information systems can be
 186 implemented based on complex system-to-system connections. Complex system-to-system
 187 connections means a lot of work when there are changes in some systems.

188
 189 Naturally there could be direct contacts between different member state systems (MSS) and
 190 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
 191 number of different member state system. Based on 28 member state systems there could be

192 hundreds of connections:

193

194 $28 \times 10 = 280 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

195 $28 \times 20 = 560 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

196 $28 \times 30 = 840 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

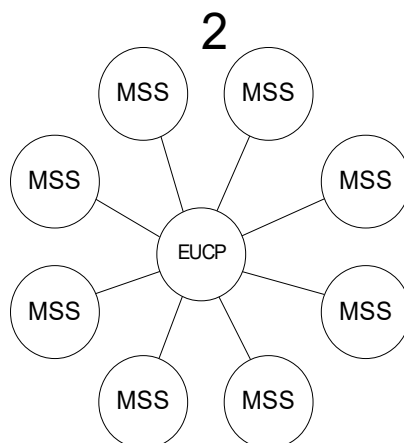
197

198 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 199 there can be member state contact points (MCP). Then there can be some hierarchy between
 200 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
 201 with member state systems in member states. Therefore member state contact points (MCP) can
 202 reduce the complexity with European Union contact point (EUCP)

203

204 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 205 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

206



207

208 **MSS = Member State System, EUCP = European Contact Point**

209

210 In the current situation, European Union member states (and some co-operation states) have their
 211 own internal IDs for several information systems. Also, the members states organised as a
 212 federation have their own internal problems with state-level IDs.

213

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

217

218 On the other hand, there are some working examples of joined or federated EU-wide registers.
 219 However, the amount of administration and needed legally binding agreements is considerable.

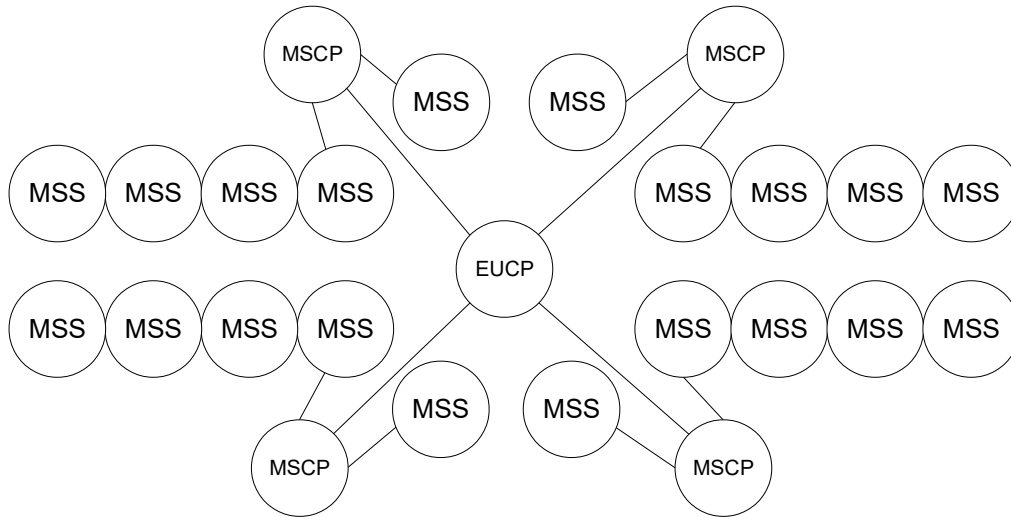
220

221 **Proposal : There could be one information system (member state contact point, MSCP)**
 222 **on member state level.**

223

224
225 [Continues on the next page]

3



MSS = Member State System

MSCP = Member State Contact Point, EUCP = European Contact Point

226
227
228 The solution can be, that member states have own Member State Contact Points (MSCP) and
229 different state level systems are combined gradually. Then the member state system IDs can be used
230 in the European Contact Point (EUCP).
231
232

233
234 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
235 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
236

237 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
238 there can be member state contact points (MCP). Then there can be some hierarchy between
239 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
240 with member state systems in member states. Therefore member state contact points (MCP) can
241 reduce the complexity with European Union contact point (EUCP).
242

243 **Proposal: Different member state systems could be consolidated based on limited**
244 **number system-to-system connections.**

245
246 **Proposal: There could be some time frames for consolidating different member state**
247 **systems (MSS) with member state contact points (MSCP).**

248
249 **Proposal: There could be some time frames for consolidating member state contact**
250 **points (MSCP) with the European Union contact point (EUCP).**

251
252 **Proposal: One information system (member state contact point, MSCP) on member**

253 **state level could handle system-to-system connections with the European Union level**
254 **(European contact point).**

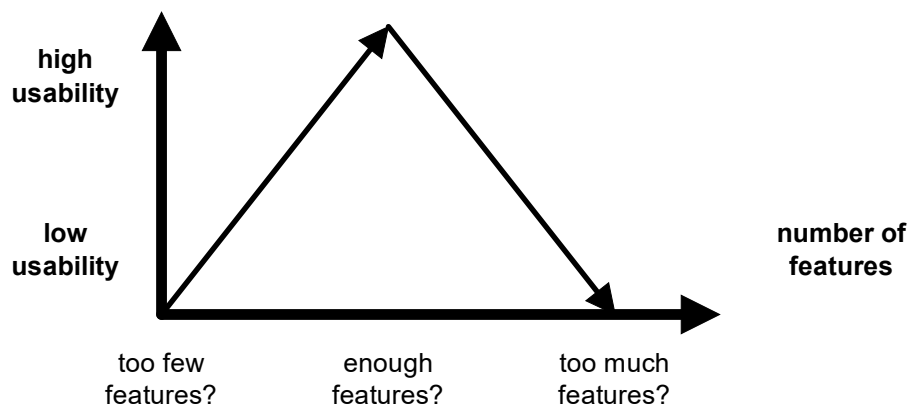
255
256 **Proposal: There could be some serious work for developing a standardised member**
257 **state contact point (MSCP).**

258
259 **Proposal: After developing a standardised member state contact point (MSCP)**
260 **different member states could consolidate their systems (MSS ↔ MSCP).**

261
262 **Proposal: European Union contact point (EUCP) and member state contact points**
263 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European**
264 **Union level.**

265
266 Naturally we have to note that developing a standardised member state contact point (MSCP) means
267 more work. On the other hand a standardised member state contact point (MSCP) could handle
268 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
269 states may have more systems than other member states. We have to note that there are different
270 systems based on several technological solutions.

271
272 **Features and requirements in different information systems**
273

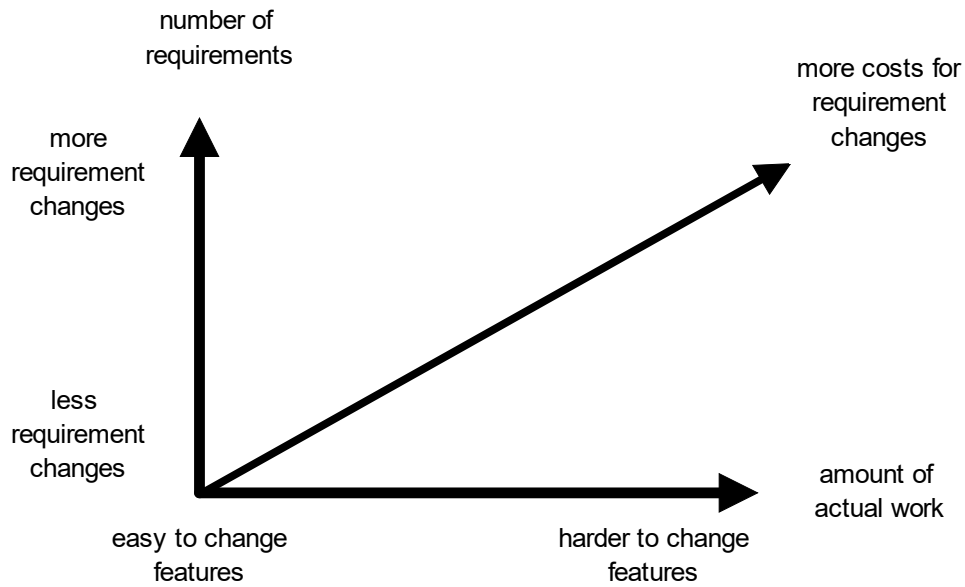


274
275
276 One issue is assessment of different features.

277
278 **Proposal: Number of different information system features could assessed carefully.**

279
280 **Proposal: There should not be too much features in information systems.**

281
282
283 [Continues on the next page]



284
285

286 One issue is number of different requirements. There can be too many requirement changes which
287 mean more work for system developers.

288

289 **Proposal: Number of requirements could be assessed carefully.**

290

291 **Proposal: All new requirements should be assessed very carefully before implementing**
292 **different requirements in different information systems.**

293

294 **Possible technical consultations**

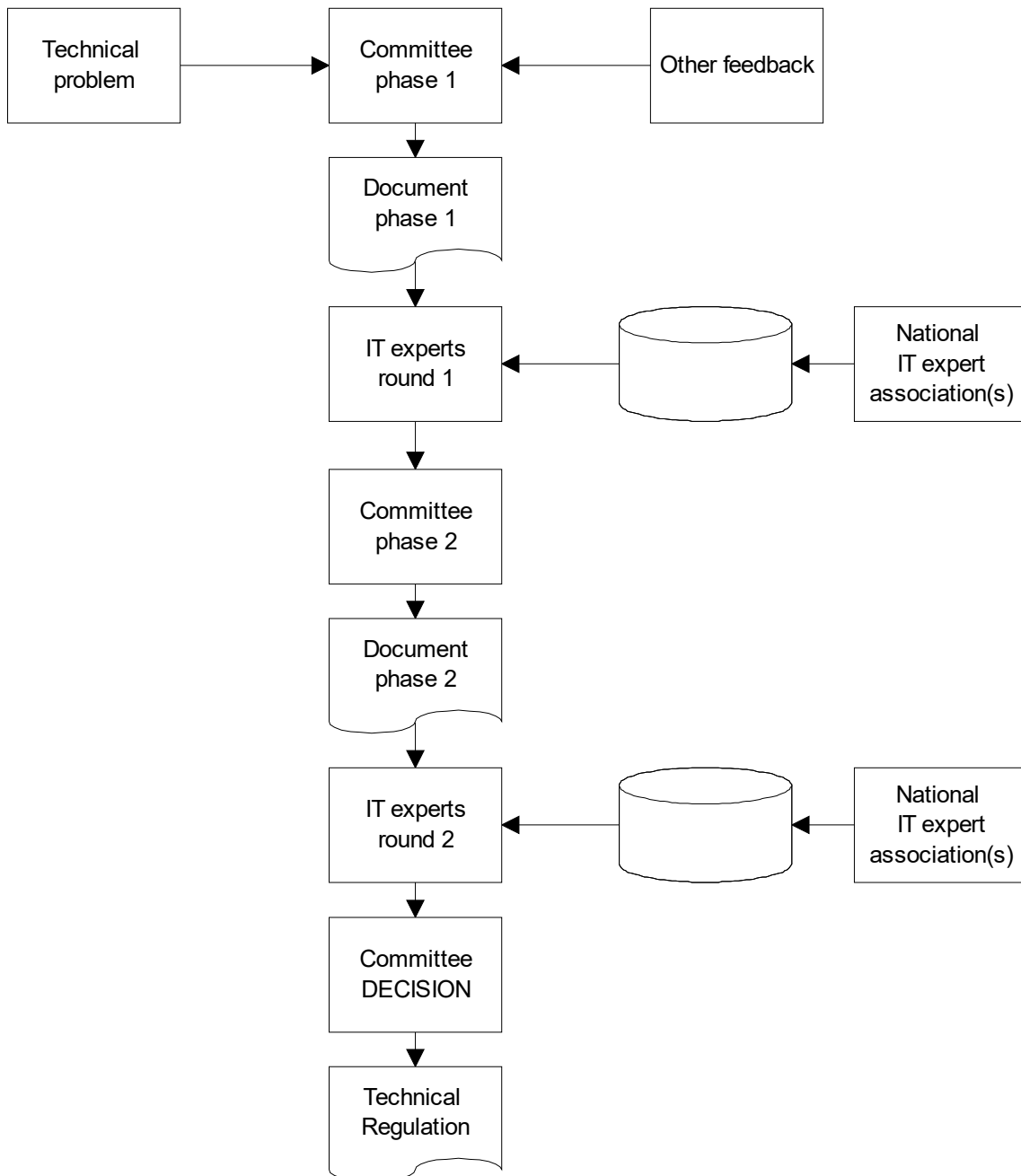
295

296 **Proposal: There could be more technical consultations based on results of this**
297 **consultation.**

298

299

300 [Continues on the next page]



301
302

303 An example of more technical consultation could be assessment of different XML formats. One
304 option is distributing information about technical consultations to different information technology
305 expert associations. Naturally there can be different phases (e.g. two phases) for assessing different
306 information technology issues.

307

308 **Proposal: Information about more technical consultations could be distributed for**
309 **different information technology expert associations.**

310

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

312



313

314

315 I have advocated usage of web feeds ¹ on several previous opinion documents. Actually there are
316 two standards for web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

317

318 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
319 **informations systems (EU / Member states).**

320

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

323

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

327

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

329

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

332

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

337

338 **Good luck!!!**

339

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

342

343

344

345 [Continues on the next page]

1 https://en.wikipedia.org/wiki/Web_feed

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

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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

- 391 EN: Opinion 19: Official Acknowledgement by the Commission
392 http://www.jukkarannila.fi/lausunnot.html#nro_19
393
- 394 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
395 http://www.jukkarannila.fi/lausunnot.html#nro_20
396
- 397 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
398 http://www.jukkarannila.fi/lausunnot.html#nro_21
399
- 400 EN: Opinion 23: Public consultation on the review of the European Standardisation System
401 http://www.jukkarannila.fi/lausunnot.html#nro_23
402
- 403 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
404 http://www.jukkarannila.fi/lausunnot.html#nro_27
405
- 406 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
407 http://www.jukkarannila.fi/lausunnot.html#nro_28
408
- 409 EN: Opinion 30: Internet Filtering
410 http://www.jukkarannila.fi/lausunnot.html#nro_30
411 NOTE: Organised by the European Committee for Standardization (CEN) ⁷
412
- 413 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
414 http://www.jukkarannila.fi/lausunnot.html#nro_32
415
- 416 EN: Opinion 34: REMIT Registration Format
417 http://www.jukkarannila.fi/lausunnot.html#nro_34
418 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁸
419
- 420 EN: Opinion 35: Exploiting the employment potential of the personal and household services
421 http://www.jukkarannila.fi/lausunnot.html#nro_35
422
- 423 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
424 http://www.jukkarannila.fi/lausunnot.html#nro_37
425
- 426 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
427 http://www.jukkarannila.fi/lausunnot.html#nro_39
428
- 429 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
430 http://www.jukkarannila.fi/lausunnot.html#nro_40
431
- 432 EN: Opinion 41: AT.39398: observations on the proposed commitments
433 http://www.jukkarannila.fi/lausunnot.html#nro_41

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

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

- 434
435 EN: Opinion 42: Opening up Education
436 http://www.jukkarannila.fi/lausunnot.html#nro_42
437
438 EN: Opinion 43: Publication of extracts of the European register of market participants
439 http://www.jukkarannila.fi/lausunnot.html#nro_43
440 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
441
442 EN: Opinion 44: Evaluation policy guidelines
443 http://www.jukkarannila.fi/lausunnot.html#nro_44
444
445 EN: Opinion 45: About ICT standardisation
446 http://www.jukkarannila.fi/lausunnot.html#nro_45
447
448 EN: Opinion 46: Review of the EU copyright rules
449 http://www.jukkarannila.fi/lausunnot.html#nro_46
450
451 EN: Opinion 51: European Area of Skills and Qualifications
452 http://www.jukkarannila.fi/lausunnot.html#nro_51
453
454 EN: Opinion 52: Trusted Cloud Europe Survey
455 http://www.jukkarannila.fi/lausunnot.html#nro_52
456
457 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
458 http://www.jukkarannila.fi/lausunnot.html#nro_53
459 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
460
461 EN: Opinion 55: European Energy Regulation
462 http://www.jukkarannila.fi/lausunnot.html#nro_55
463 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
464
465 EN: Opinion 59: Green paper on mobile Health
466 http://www.jukkarannila.fi/lausunnot.html#nro_59
467
468 EN: Opinion 60: Cross-border inheritance tax problems within the EU
469 http://www.jukkarannila.fi/lausunnot.html#nro_60
470
471 EN: Opinion 61: European Register of Products Containing Nanomaterials
472 http://www.jukkarannila.fi/lausunnot.html#nro_61
473
474 EN: Opinion 64: Corporate Social Responsibility - European Commission
475 http://www.jukkarannila.fi/lausunnot.html#nro_64
476
477 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
478 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 479
480 EN: Opinion 68: European Network Code Stakeholder Committees
481 http://www.jukkarannila.fi/lausunnot.html#nro_68
482 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
483
484 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
485 http://www.jukkarannila.fi/lausunnot.html#nro_71
486 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
487
488 EN: Opinion 74: Enabling the Internet of Things
489 http://www.jukkarannila.fi/lausunnot.html#nro_74
490 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁹
491
492 EN: Opinion 80: Mandatory Transparency Register
493 http://www.jukkarannila.fi/lausunnot.html#nro_80
494
495 EN: Opinion 84: Revision of the European Interoperability Framework
496 http://www.jukkarannila.fi/lausunnot.html#nro_84
497
498 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
499 http://www.jukkarannila.fi/lausunnot.html#nro_86
500
501 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
502 http://www.jukkarannila.fi/lausunnot.html#nro_88
503
504 EN: Opinion 89: BEREC Guidelines for net neutrality rules
505 http://www.jukkarannila.fi/lausunnot.html#nro_89
506 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
507
508 EN: Opinion 93: Safety of apps and other non-embedded software
509 http://www.jukkarannila.fi/lausunnot.html#nro_93
510
511 EN: Opinion 95: Targeted consultation on eForms
512 http://www.jukkarannila.fi/lausunnot.html#nro_95
513
514 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
515 http://www.jukkarannila.fi/lausunnot.html#nro_97
516
517 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
518 http://www.jukkarannila.fi/lausunnot.html#nro_98
519
520 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
521 Regulators. Recast
522 http://www.jukkarannila.fi/lausunnot.html#nro_99

⁹ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 523 EN: Opinion 100: Protection of personal data (EU)
524 http://www.jukkarannila.fi/lausunnot.html#nro_100
525
- 526 EN: Opinion 101: Governance of the Energy Union
527 http://www.jukkarannila.fi/lausunnot.html#nro_101
528
- 529 EN: Opinion 102: Smart Wearables
530 http://www.jukkarannila.fi/lausunnot.html#nro_102
531
- 532 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
533 (ENISA)
534 http://www.jukkarannila.fi/lausunnot.html#nro_106
535
- 536 EN: Opinion 108: Single Digital Gateway
537 http://www.jukkarannila.fi/lausunnot.html#nro_108
538
- 539 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
540 http://www.jukkarannila.fi/lausunnot.html#nro_110
541
- 542 EN: Opinion 111: Interoperability of information systems for migration and security
543 http://www.jukkarannila.fi/lausunnot.html#nro_111
544
- 545 EN: Opinion 113: Transform of health and care
546 http://www.jukkarannila.fi/lausunnot.html#nro_113
547
- 548 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
549 Internet
550 http://www.jukkarannila.fi/lausunnot.html#nro_114
551 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
552
- 553 EN: Opinion 118: Fake news and online disinformation
554 http://www.jukkarannila.fi/lausunnot.html#nro_118
555
- 556 EN: Opinion 119: European Social Security Number
557 http://www.jukkarannila.fi/lausunnot.html#nro_119
558
- 559 EN: Opinion 120: European Labour Authority
560 http://www.jukkarannila.fi/lausunnot.html#nro_120
561
- 562 EN: Opinion 121: 2nd Data Package
563 http://www.jukkarannila.fi/lausunnot.html#nro_121
564
- 565 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
566 Cybersecurity Research and Competence Centre
567 http://www.jukkarannila.fi/lausunnot.html#nro_122

- 568 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
569 THE COUNCIL on the re-use of public sector information (recast)
570 http://www.jukkarannila.fi/lausunnot.html#nro_123
571
- 572 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
573 http://www.jukkarannila.fi/lausunnot.html#nro_125
574
- 575 EN: Opinion 128: Summertime arrangements
576 http://www.jukkarannila.fi/lausunnot.html#nro_128
577
- 578 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
579 http://www.jukkarannila.fi/lausunnot.html#nro_129
580
- 581 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
582 http://www.jukkarannila.fi/lausunnot.html#nro_132
583
- 584 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
585 ("eForms")
586 http://www.jukkarannila.fi/lausunnot.html#nro_133
587
- 588 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
589 UCC
590 http://www.jukkarannila.fi/lausunnot.html#nro_134
591
- 592 EN: Opinion 141: Farm Accountancy Data Network
593 http://www.jukkarannila.fi/lausunnot.html#nro_141
594
- 595 EN: Opinion 142: Horizon Europe (two consultations)
596 http://www.jukkarannila.fi/lausunnot.html#nro_142
597
- 598 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
599 (evaluation)
600 http://www.jukkarannila.fi/lausunnot.html#nro_144
601
- 602 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
603 http://www.jukkarannila.fi/lausunnot.html#nro_146
604 NOTE: Organised by the European Committee for Standardization (CEN)
605
606
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608 [Continues on the next page]

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ANNEX 2

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