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TO:
Unit I4. Media Convergence & Social Media
Directorate-General for Communications Networks, Content and Technology
European Commission

Ref. Ares(2021)2230395 – 31/03/2021
Guidance on strengthening the Code of Practice on Disinformation

First of all, a lot of thanks to Directorate-General for Communications Networks, Content and Technology 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]

42

43 About previous consultations / Repeating several issues

44

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

48

49 Highlighting only some issues

50

51 This opinion does not handle all issues which are mentioned on the consultation document. I have
52 presented different issues to different units of the European Commission. Generally speaking many
53 proposals are already implemented and therefore I don't present all possible issues based on this
54 consultation.

55

**56 Consultation document is technologically neutral and does not mentioning any company
57 names**

58

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

61

62 Creation of different feeds

63

64 Here we can note that there is a standard (ClaimReview) for reporting disinformation. ClaimReview
65 is a standard which is used for reporting fact-checking reviews.

66

67 <https://schema.org/ClaimReview>

68

69 **NOTE: Creation of a specific standard (cf. ClaimReview) means cooperation between
70 several stakeholders which use and develop different information systems.**

71

72 **Proposal: There could be some assessment for creation of specific feeds for assessing
73 disinformation – e.g. ClaimReview**

74

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

76



77

78

79 I have advocated usage of web feeds ¹ on several previous opinion documents. I have advocated
80 usage of web feeds on several previous opinion documents. Actually there are two standards for

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

82 web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

83

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

86

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

89

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

93

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

95

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

98

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

103

104 **Global cooperation**

105

106 ClaimReview standard and web feed standards could be used globally – not just inside European
107 Union.

108

109 **EU-wide level?**

110

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

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116 [Continues on the next page]

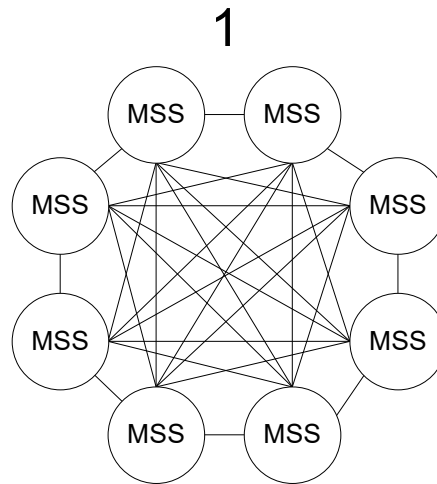
2 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

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



MSS = Member State System

117
118
119

120 There are 27 member states (European Union) at the moment. In reality there are unique situations
121 with information systems in different member states. In some cases information systems can be
122 implemented based on complex system-to-system connections. Complex system-to-system
123 connections means a lot of work when there are changes in some systems.

124

125 Naturally there could be direct contacts between different member state systems (MSS) and
126 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
127 number of different member state system. Based on 27 member state systems there could be
128 hundreds of connections:

129

130 $27 \times 10 = 270 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

131 $27 \times 20 = 540 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

132 $27 \times 30 = 810 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$

133

134 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
135 there can be member state contact points (MSCP). Then there can be some hierarchy between
136 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
137 with member state systems in member states. Therefore member state contact points (MSCP) can
138 reduce the complexity with European Union contact point (EUCP)

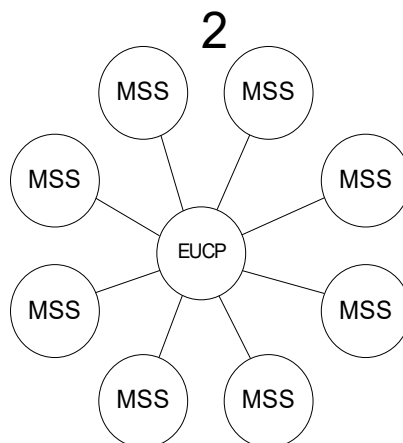
139

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

142

143

144 [Continues on the next page]



MSS = Member State System, EUCP = European Contact Point

145

146

147

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

151

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

155

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

158

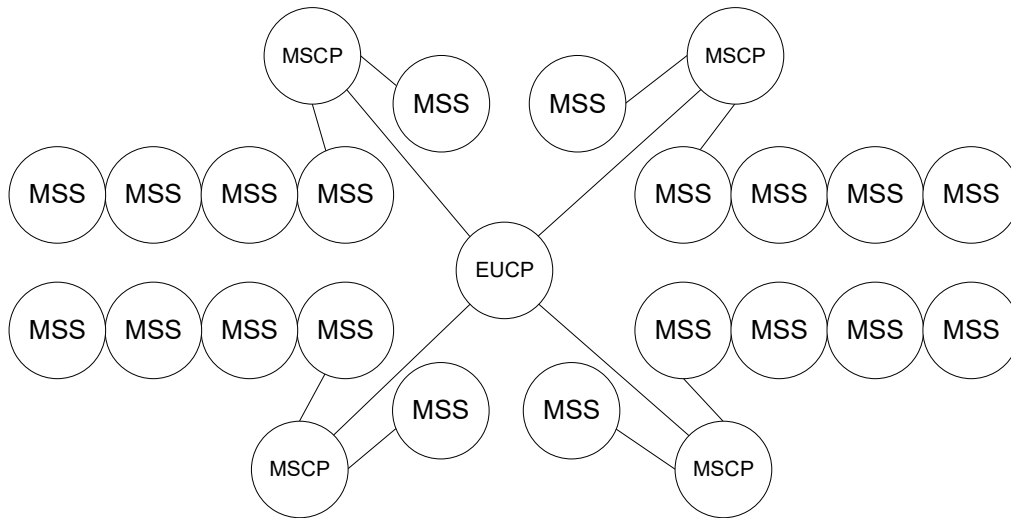
159 **Proposal : There could be one information system (member state contact point, MSCP)**
160 **on member state level.**

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163 [Continues on the next page]

3



MSS = Member State System

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

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

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

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

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

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

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

Proposal: One information system (member state contact point, MSCP) on member state level could handle system-to-system connections with the European Union level (European contact point).

193

194

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

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

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

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

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Cooperation with fact-checkers / Global issues

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Following text is mention on the roadmap document:

213

214

“Encouraging cooperation with fact-checkers and academic researchers to better understand and limit the impact of the disinformation phenomenon.”

215

216

217

Like mentioned before this can mean global cooperation and global standards – e.g. ClaimReview and web feeds.

218

219

220

Proposal: European Commission could promote global cooperation and global standards since disinformation is distributed globally.

221

222

223

Question: Could there be one global contact point for assessing disinformation?

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227

Good luck!!!

228

229

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

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[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

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

- 279 EN: Opinion 19: Official Acknowledgement by the Commission
280 http://www.jukkarannila.fi/lausunnot.html#nro_19
281
- 282 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
283 http://www.jukkarannila.fi/lausunnot.html#nro_20
284
- 285 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
286 http://www.jukkarannila.fi/lausunnot.html#nro_21
287
- 288 EN: Opinion 23: Public consultation on the review of the European Standardisation System
289 http://www.jukkarannila.fi/lausunnot.html#nro_23
290
- 291 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
292 http://www.jukkarannila.fi/lausunnot.html#nro_27
293
- 294 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
295 http://www.jukkarannila.fi/lausunnot.html#nro_28
296
- 297 EN: Opinion 30: Internet Filtering
298 http://www.jukkarannila.fi/lausunnot.html#nro_30
299 NOTE: Organised by the European Committee for Standardization (CEN) ⁷
300
- 301 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
302 http://www.jukkarannila.fi/lausunnot.html#nro_32
303
- 304 EN: Opinion 34: REMIT Registration Format
305 http://www.jukkarannila.fi/lausunnot.html#nro_34
306 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁸
307
- 308 EN: Opinion 35: Exploiting the employment potential of the personal and household services
309 http://www.jukkarannila.fi/lausunnot.html#nro_35
310
- 311 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
312 http://www.jukkarannila.fi/lausunnot.html#nro_37
313
- 314 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
315 http://www.jukkarannila.fi/lausunnot.html#nro_39
316
- 317 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
318 http://www.jukkarannila.fi/lausunnot.html#nro_40
319
- 320 EN: Opinion 41: AT.39398: observations on the proposed commitments
321 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)

- 322
323 EN: Opinion 42: Opening up Education
324 http://www.jukkarannila.fi/lausunnot.html#nro_42
325
326 EN: Opinion 43: Publication of extracts of the European register of market participants
327 http://www.jukkarannila.fi/lausunnot.html#nro_43
328 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
329
330 EN: Opinion 44: Evaluation policy guidelines
331 http://www.jukkarannila.fi/lausunnot.html#nro_44
332
333 EN: Opinion 45: About ICT standardisation
334 http://www.jukkarannila.fi/lausunnot.html#nro_45
335
336 EN: Opinion 46: Review of the EU copyright rules
337 http://www.jukkarannila.fi/lausunnot.html#nro_46
338
339 EN: Opinion 51: European Area of Skills and Qualifications
340 http://www.jukkarannila.fi/lausunnot.html#nro_51
341
342 EN: Opinion 52: Trusted Cloud Europe Survey
343 http://www.jukkarannila.fi/lausunnot.html#nro_52
344
345 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
346 http://www.jukkarannila.fi/lausunnot.html#nro_53
347 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
348
349 EN: Opinion 55: European Energy Regulation
350 http://www.jukkarannila.fi/lausunnot.html#nro_55
351 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
352
353 EN: Opinion 59: Green paper on mobile Health
354 http://www.jukkarannila.fi/lausunnot.html#nro_59
355
356 EN: Opinion 60: Cross-border inheritance tax problems within the EU
357 http://www.jukkarannila.fi/lausunnot.html#nro_60
358
359 EN: Opinion 61: European Register of Products Containing Nanomaterials
360 http://www.jukkarannila.fi/lausunnot.html#nro_61
361
362 EN: Opinion 64: Corporate Social Responsibility - European Commission
363 http://www.jukkarannila.fi/lausunnot.html#nro_64
364
365 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
366 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 367 EN: Opinion 68: European Network Code Stakeholder Committees
368 http://www.jukkarannila.fi/lausunnot.html#nro_68
369 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
370
371 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
372 http://www.jukkarannila.fi/lausunnot.html#nro_71
373 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
374
375 EN: Opinion 74: Enabling the Internet of Things
376 http://www.jukkarannila.fi/lausunnot.html#nro_74
377 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁹
378
379 EN: Opinion 80: Mandatory Transparency Register
380 http://www.jukkarannila.fi/lausunnot.html#nro_80
381
382 EN: Opinion 84: Revision of the European Interoperability Framework
383 http://www.jukkarannila.fi/lausunnot.html#nro_84
384
385 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
386 http://www.jukkarannila.fi/lausunnot.html#nro_86
387
388 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
389 http://www.jukkarannila.fi/lausunnot.html#nro_88
390
391 EN: Opinion 89: BEREC Guidelines for net neutrality rules
392 http://www.jukkarannila.fi/lausunnot.html#nro_89
393 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
394
395 EN: Opinion 93: Safety of apps and other non-embedded software
396 http://www.jukkarannila.fi/lausunnot.html#nro_93
397
398 EN: Opinion 95: Targeted consultation on eForms
399 http://www.jukkarannila.fi/lausunnot.html#nro_95
400
401 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
402 http://www.jukkarannila.fi/lausunnot.html#nro_97
403
404 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
405 http://www.jukkarannila.fi/lausunnot.html#nro_98
406
407 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
408 Regulators. Recast
409 http://www.jukkarannila.fi/lausunnot.html#nro_99
410

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

- 411 EN: Opinion 100: Protection of personal data (EU)
412 http://www.jukkarannila.fi/lausunnot.html#nro_100
413
- 414 EN: Opinion 101: Governance of the Energy Union
415 http://www.jukkarannila.fi/lausunnot.html#nro_101
416
- 417 EN: Opinion 102: Smart Wearables
418 http://www.jukkarannila.fi/lausunnot.html#nro_102
419
- 420 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
421 (ENISA)
422 http://www.jukkarannila.fi/lausunnot.html#nro_106
423
- 424 EN: Opinion 108: Single Digital Gateway
425 http://www.jukkarannila.fi/lausunnot.html#nro_108
426
- 427 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
428 http://www.jukkarannila.fi/lausunnot.html#nro_110
429
- 430 EN: Opinion 111: Interoperability of information systems for migration and security
431 http://www.jukkarannila.fi/lausunnot.html#nro_111
432
- 433 EN: Opinion 113: Transform of health and care
434 http://www.jukkarannila.fi/lausunnot.html#nro_113
435
- 436 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
437 Internet
438 http://www.jukkarannila.fi/lausunnot.html#nro_114
439 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
440
- 441 EN: Opinion 118: Fake news and online disinformation
442 http://www.jukkarannila.fi/lausunnot.html#nro_118
443
- 444 EN: Opinion 119: European Social Security Number
445 http://www.jukkarannila.fi/lausunnot.html#nro_119
446
- 447 EN: Opinion 120: European Labour Authority
448 http://www.jukkarannila.fi/lausunnot.html#nro_120
449
- 450 EN: Opinion 121: 2nd Data Package
451 http://www.jukkarannila.fi/lausunnot.html#nro_121
452
- 453 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
454 Cybersecurity Research and Competence Centre
455 http://www.jukkarannila.fi/lausunnot.html#nro_122

- 456
457 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
458 THE COUNCIL on the re-use of public sector information (recast)
459 http://www.jukkarannila.fi/lausunnot.html#nro_123
460
461 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
462 http://www.jukkarannila.fi/lausunnot.html#nro_125
463
464 EN: Opinion 128: Summertime arrangements
465 http://www.jukkarannila.fi/lausunnot.html#nro_128
466
467 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
468 http://www.jukkarannila.fi/lausunnot.html#nro_129
469
470 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
471 http://www.jukkarannila.fi/lausunnot.html#nro_132
472
473 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
474 ("eForms")
475 http://www.jukkarannila.fi/lausunnot.html#nro_133
476
477 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
478 UCC
479 http://www.jukkarannila.fi/lausunnot.html#nro_134
480
481 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
482 http://www.jukkarannila.fi/lausunnot.html#nro_139
483
484 EN: Opinion 141: Farm Accountancy Data Network
485 http://www.jukkarannila.fi/lausunnot.html#nro_141
486
487 EN: Opinion 142: Horizon Europe (two consultations)
488 http://www.jukkarannila.fi/lausunnot.html#nro_142
489
490 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
491 (evaluation)
492 http://www.jukkarannila.fi/lausunnot.html#nro_144
493
494 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
495 http://www.jukkarannila.fi/lausunnot.html#nro_146
496 NOTE: Organised by the European Committee for Standardization (CEN)
497
498 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
499 http://www.jukkarannila.fi/lausunnot.html#nro_147
500

- 501 EN: Opinion 152: Revision of the Non-Financial Reporting Directive
502 http://www.jukkarannila.fi/lausunnot.html#nro_152
503
- 504 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
505 http://www.jukkarannila.fi/lausunnot.html#nro_154
506
- 507 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
508 2021
509 http://www.jukkarannila.fi/lausunnot.html#nro_156
510
- 511 EN: Opinion 159: EU competition law - market definition notice (evaluation)
512 http://www.jukkarannila.fi/lausunnot.html#nro_159
513
- 514 EN: Opinion 161: New Competition Tool ('NCT')
515 http://www.jukkarannila.fi/lausunnot.html#nro_161
516
- 517 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
518 platforms acting as gatekeepers
519 http://www.jukkarannila.fi/lausunnot.html#nro_162
520
- 521 EN: Opinion 165: Legislative framework for the governance of common European data spaces
522 http://www.jukkarannila.fi/lausunnot.html#nro_165
523
- 524 EN: Opinion 166: Sharing information between national business registers
525 http://www.jukkarannila.fi/lausunnot.html#nro_166
526
- 527 EN: Opinion 167: Interoperable digital public services - European Interoperability Framework
528 evaluation & strategy
529 http://www.jukkarannila.fi/lausunnot.html#nro_167
530
- 531 EN: Opinion 169: Fighting child sexual abuse: detection, removal and reporting of illegal content
532 online
533 http://www.jukkarannila.fi/lausunnot.html#nro_169
534
- 535 EN: Opinion 170: Data sharing in the EU - common European data spaces (new rules)
536 http://www.jukkarannila.fi/lausunnot.html#nro_170
537
538
539
- 540 My opinions to the previous and relevant consultations – there consultations were mostly organised
541 by the European Commission. General page to all consultations – both in English and in Finnish:
542 <http://www.jukkarannila.fi/lausunnot.html>
543
544
- 545 [Continues on the next page]

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ANNEX 2

548 DISCLAIMERS

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550 Legal disclaimer:

551 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
552 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

553 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
554 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
555 actor making those actions.

556

557 Political disclaimer:

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