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2 TO:  
3 Unit A.3: Competitive electronics industry  
4 Directorate-General for Communications Networks, Content and Technology  
5 European Commission

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7 TO:  
8 Unit E.1: Future Connectivity Systems  
9 Directorate-General for Communications Networks, Content and Technology  
10 European Commission

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12 **Reference: European Partnership for Key Digital Technologies – consultation**  
13 **Reference: European Partnership for Smart Networks and Services – consultation**

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15  
16 First of all, a lot of thanks to Directorate-General for Communications Networks, Content and  
17 Technology (Unit A.3 and Unit E.1 ) for organising these two important consultations.

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

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21 This opinion does not contain:  
22 – any business secrets  
23 – any trade secrets  
24 – any confidential information.

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

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30 Annex 1 holds information about previous consultations at the European Union level  
31 Annex 2 holds information about disclaimers and copyright.

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34 Best Regards,

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37 Jukka S. Rannila  
38 citizen of Finland

39  
40 signed electronically

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42 [Continues on the next page]

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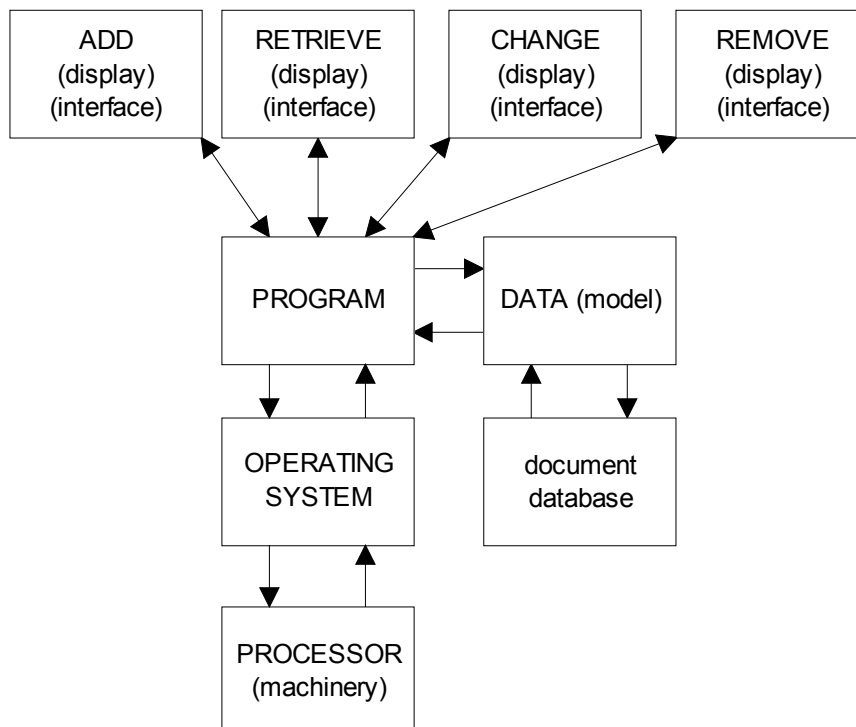
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46 **One presentation for information system**

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48 Following figure is one conception of information system.

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

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59 **What this means to systems?**

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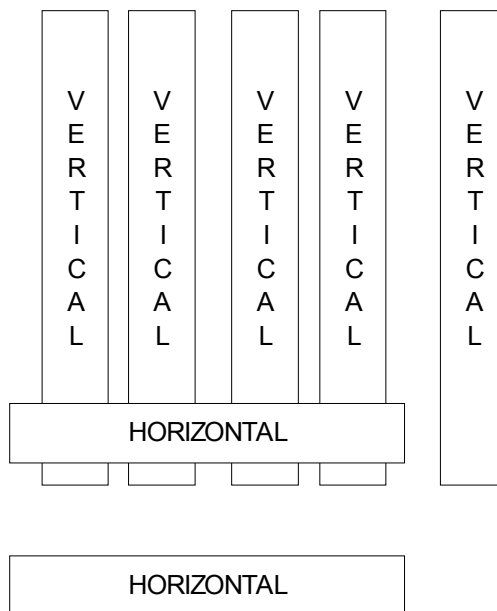
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- 1) **There can be several processor (machinery) possibilities**
- 2) **There can be several operating systems possibilities**
- 3) **There can be several programs possibilities**
- 4) **Programs handle data in different ways**
- 5) **The data can modelled in different ways**
- 6) **There can documents and/or databases in different systems**
- 7) **There are always four basic functions (add, retrieve, change, remove).**
- 8) **There are several providers of different computer programs.**
- 9) **There are naturally competing programs.**
- 10) **Different programs comply with different standards.**

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### Horizontal and vertical technologies – generally



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

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

### Horizontal and vertical software

Software can be developed both vertically and horizontally.

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

### More lasting solutions for developing and/or researching different software

Consultation documents handle European Partnerships as a possibility to organising research. Software is very central issue and there could be more lasting solutions for developing and/or researching software. One comparison can be made with <sup>1</sup> Software Engineering Institute (Carnegie Mellon University) which is nowadays very central stakeholder when developing and/or researching different software.

<sup>1</sup> <https://www.sei.cmu.edu/>, Software Engineering Institute (Carnegie Mellon University)

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**Proposal: There could be more lasting institutional solutions (cf. Software Engineering Institute) for developing and/or researching different software in the European Union context.**

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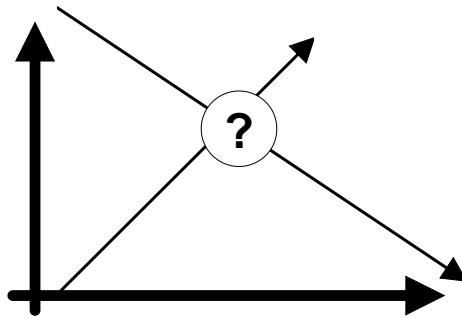
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**Developing more general solutions and more specific solutions**

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GENERAL KNOWLEDGE



SPECIAL KNOWLEDGE

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There are some possibilities for developing information technologies:

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1) pure information technologies – pure basic research

2) embedding computing machinery with (hard) products – applied research

3) developing information services to be used with (hard) products – applied research

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**Proposal: There should be some balance between pure basic research and applied research when implementing Horizon Europe program in the future.**

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**Question: Is Horizon Europe program pure basic research or applied research?**

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**Good luck!!!**

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

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### **ANNEX 1**

My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission. General page to all consultations – both in English and in Finnish:

<http://www.jukkarannila.fi/lausunnot.html>

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

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

[http://www.jukkarannila.fi/lausunnot.html#nro\\_1](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)

- 171 EN: Opinion 19: Official Acknowledgement by the Commission  
172 [http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)  
173
- 174 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
175 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
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- 177 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
178 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
179
- 180 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
181 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
182
- 183 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
184 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
185
- 186 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
187 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
188
- 189 EN: Opinion 30: Internet Filtering  
190 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
191 NOTE: Organised by the European Committee for Standardization (CEN) <sup>2</sup>  
192
- 193 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
194 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
195
- 196 EN: Opinion 34: REMIT Registration Format  
197 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
198 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>3</sup>  
199
- 200 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
201 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
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- 203 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
204 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
205
- 206 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
207 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
208
- 209 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
210 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
211
- 212 EN: Opinion 41: AT.39398: observations on the proposed commitments  
213 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)

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

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

- 214  
215 EN: Opinion 42: Opening up Education  
216 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)  
217  
218 EN: Opinion 43: Publication of extracts of the European register of market participants  
219 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
220 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
221  
222 EN: Opinion 44: Evaluation policy guidelines  
223 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
224  
225 EN: Opinion 45: About ICT standardisation  
226 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
227  
228 EN: Opinion 46: Review of the EU copyright rules  
229 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
230  
231 EN: Opinion 51: European Area of Skills and Qualifications  
232 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
233  
234 EN: Opinion 52: Trusted Cloud Europe Survey  
235 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
236  
237 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
238 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
239 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
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241 EN: Opinion 55: European Energy Regulation  
242 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
243 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
244  
245 EN: Opinion 59: Green paper on mobile Health  
246 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
247  
248 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
249 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
250  
251 EN: Opinion 61: European Register of Products Containing Nanomaterials  
252 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
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254 EN: Opinion 64: Corporate Social Responsibility - European Commission  
255 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
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257 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
258 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)

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260 EN: Opinion 68: European Network Code Stakeholder Committees  
261 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
262 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
263  
264 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
265 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
266 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
267  
268 EN: Opinion 74: Enabling the Internet of Things  
269 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
270 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) <sup>4</sup>  
271  
272 EN: Opinion 80: Mandatory Transparency Register  
273 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
274  
275 EN: Opinion 84: Revision of the European Interoperability Framework  
276 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
277  
278 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
279 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
280  
281 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
282 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
283  
284 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
285 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
286 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
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288 EN: Opinion 93: Safety of apps and other non-embedded software  
289 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
290  
291 EN: Opinion 95: Targeted consultation on eForms  
292 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
293  
294 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)  
295 [http://www.jukkarannila.fi/lausunnot.html#nro\\_97](http://www.jukkarannila.fi/lausunnot.html#nro_97)  
296  
297 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals  
298 [http://www.jukkarannila.fi/lausunnot.html#nro\\_98](http://www.jukkarannila.fi/lausunnot.html#nro_98)  
299  
300 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy  
301 Regulators. Recast  
302 [http://www.jukkarannila.fi/lausunnot.html#nro\\_99](http://www.jukkarannila.fi/lausunnot.html#nro_99)

<sup>4</sup> <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)



- 303  
304 EN: Opinion 100: Protection of personal data (EU)  
305 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)  
306  
307 EN: Opinion 101: Governance of the Energy Union  
308 [http://www.jukkarannila.fi/lausunnot.html#nro\\_101](http://www.jukkarannila.fi/lausunnot.html#nro_101)  
309  
310 EN: Opinion 102: Smart Wearables  
311 [http://www.jukkarannila.fi/lausunnot.html#nro\\_102](http://www.jukkarannila.fi/lausunnot.html#nro_102)  
312  
313 EN: Opinion 106: Review of the European Union Agency for Network and Information Security  
314 (ENISA)  
315 [http://www.jukkarannila.fi/lausunnot.html#nro\\_106](http://www.jukkarannila.fi/lausunnot.html#nro_106)  
316  
317 EN: Opinion 108: Single Digital Gateway  
318 [http://www.jukkarannila.fi/lausunnot.html#nro\\_108](http://www.jukkarannila.fi/lausunnot.html#nro_108)  
319  
320 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code  
321 [http://www.jukkarannila.fi/lausunnot.html#nro\\_110](http://www.jukkarannila.fi/lausunnot.html#nro_110)  
322  
323 EN: Opinion 111: Interoperability of information systems for migration and security  
324 [http://www.jukkarannila.fi/lausunnot.html#nro\\_111](http://www.jukkarannila.fi/lausunnot.html#nro_111)  
325  
326 EN: Opinion 113: Transform of health and care  
327 [http://www.jukkarannila.fi/lausunnot.html#nro\\_113](http://www.jukkarannila.fi/lausunnot.html#nro_113)  
328  
329 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the  
330 Internet  
331 [http://www.jukkarannila.fi/lausunnot.html#nro\\_114](http://www.jukkarannila.fi/lausunnot.html#nro_114)  
332 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
333  
334 EN: Opinion 118: Fake news and online disinformation  
335 [http://www.jukkarannila.fi/lausunnot.html#nro\\_118](http://www.jukkarannila.fi/lausunnot.html#nro_118)  
336  
337 EN: Opinion 119: European Social Security Number  
338 [http://www.jukkarannila.fi/lausunnot.html#nro\\_119](http://www.jukkarannila.fi/lausunnot.html#nro_119)  
339  
340 EN: Opinion 120: European Labour Authority  
341 [http://www.jukkarannila.fi/lausunnot.html#nro\\_120](http://www.jukkarannila.fi/lausunnot.html#nro_120)  
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343 EN: Opinion 121: 2nd Data Package  
344 [http://www.jukkarannila.fi/lausunnot.html#nro\\_121](http://www.jukkarannila.fi/lausunnot.html#nro_121)  
345  
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348 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European  
349 Cybersecurity Research and Competence Centre

350 [http://www.jukkarannila.fi/lausunnot.html#nro\\_122](http://www.jukkarannila.fi/lausunnot.html#nro_122)

351

352 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF  
353 THE COUNCIL on the re-use of public sector information (recast)

354 [http://www.jukkarannila.fi/lausunnot.html#nro\\_123](http://www.jukkarannila.fi/lausunnot.html#nro_123)

355

356 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents

357 [http://www.jukkarannila.fi/lausunnot.html#nro\\_125](http://www.jukkarannila.fi/lausunnot.html#nro_125)

358

359 EN: Opinion 128: Summertime arrangements

360 [http://www.jukkarannila.fi/lausunnot.html#nro\\_128](http://www.jukkarannila.fi/lausunnot.html#nro_128)

361

362 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange

363 [http://www.jukkarannila.fi/lausunnot.html#nro\\_129](http://www.jukkarannila.fi/lausunnot.html#nro_129)

364

365 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data

366 [http://www.jukkarannila.fi/lausunnot.html#nro\\_132](http://www.jukkarannila.fi/lausunnot.html#nro_132)

367

368 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement  
369 ("eForms")

370 [http://www.jukkarannila.fi/lausunnot.html#nro\\_133](http://www.jukkarannila.fi/lausunnot.html#nro_133)

371

372 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by  
373 UCC

374 [http://www.jukkarannila.fi/lausunnot.html#nro\\_134](http://www.jukkarannila.fi/lausunnot.html#nro_134)

375

376 EN: Opinion 141: Farm Accountancy Data Network

377 [http://www.jukkarannila.fi/lausunnot.html#nro\\_141](http://www.jukkarannila.fi/lausunnot.html#nro_141)

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384 <http://www.jukkarannila.fi/lausunnot.html>

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390 Legal disclaimer:

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

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

396

397 Political disclaimer:

398 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and  
399 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal  
400 entity making law proposals.

401

402 These opinions are not meant to be extreme-right, moderate-right, extreme-centre, moderate-centre, extreme-left or  
403 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of  
404 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or  
405 worldwide politics.

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407 These opinions are not meant to rally for a candidacy in any public election at any level.

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409 Content of web pages:

410 This text may or may not refer to web pages. The content of those web pages is not responsibility of author of this  
411 document. They are referenced on the date of this document. If referenced web pages are not found after the date when  
412 this document is dated, that situation is not responsibility of the author. All changes done in the web pages this  
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417 Use of broken English

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