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TO:
Unit E.2: Cloud & Software
Directorate-General for Communications Networks, Content and Technology
European Commission

Reference: Roadmap – Ref. Ares(2019)867420 – 13/02/2019 – Informative guidance on the Regulation on the Free flow of non-personal data

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 disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

[Continues on the next page]

42

43 Previous opinions

44

45 Annex 1 holds information about previous consultations and my previous opinions.

46

47 Here we can note that I have repeated the same issues based on previous consultations. Different
48 units of the European Commission already know something about my previous opinions

49

50 This consultation

51

52 On roadmap (Ref. Ares(2019)867420 – 13/02/2019) document (page 2) is following text:

53

54 **In this regard, the objective of the present initiative is to provide the businesses with
55 clarity and understanding of the Free flow of non-personal data regulation.**

56

57 Here I note that clarity and understanding of the Free flow of non-personal data regulation means
58 assessing different standards.

59

60 About different standards

61

62 I have proposed several times usage of *open horizontal standards* when developing different
63 information systems.

64

65 Favouring open standards / Favouring horizontal standards

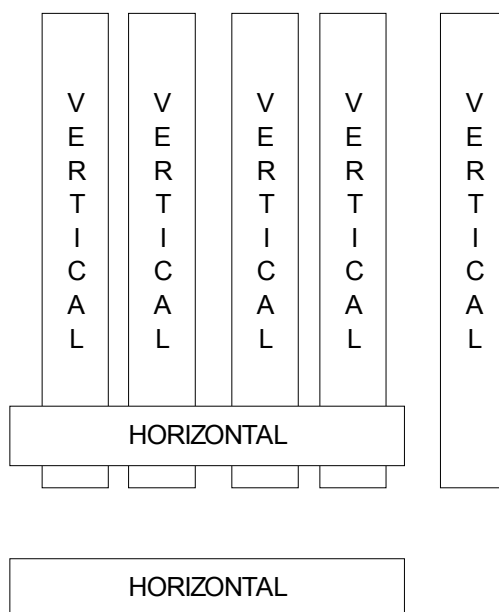
66

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

71

72

73 [Continues on the next page]



74
75

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

77

Proposal: Using horizontal standards could be favoured when creating different information systems at the European Union level.

80

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

83

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

85

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

87

Proposal: There could be different standardisation efforts to horizontal standards and vertical standards

90

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

93

94 Here we can note that different national details can be vertical standards.

95

Proposal: Different (vertical) national details (standards) should not hinder usage of (European) other standards (horizontal).

98

99

100 Here we can note some problems:

101

- 102 • some systems are based on **de-facto** standards
- 103 • some systems are based on **de-jure** standards
- 104 • there can be confrontations between **de-facto** and **de-jure** standards
- 105 • there can be a monopoly situation in some domain
- 106 • some standards may inhibit possible actions of some stakeholders
- 107 • there can be a standard war on some domains
- 108 • standards have different life-cycles
- 109 • systems have different life-cycles
- 110 • there can be mismatches between different life-cycles
- 111 • there can be failed standards
- 112 • there can be deprecated standards.

113

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

118

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

125

126 There are different standards setting organisations on the information technology field. One list ¹ of
127 these standards setting organisations is provided by ConsortiumInfo.org.

128

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

132

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

135

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

138

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

140

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

143

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

1 Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php

146

147

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

148

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150

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

151

152

153 Complexity at the European Union level

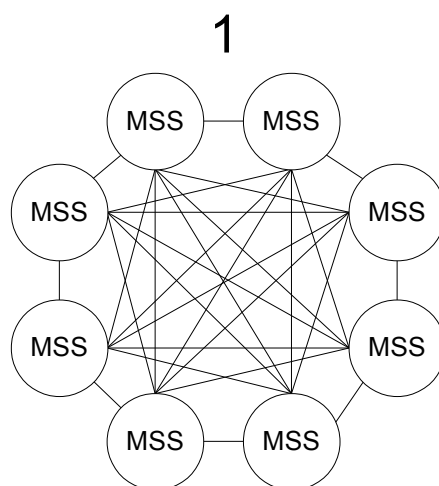
154

155 I have noted several times that different member state systems (MSS) can interlinked in many ways.

156 This means that co-operation with European Union systems means a lot of work. This leads to the

157 question of a European Contact Point (EUCP) for different member state systems (MSS).

158



MSS = Member State System

159

160

161

162 There are 28 member states (European Union) at the moment. In reality there are unique situations

163 with information systems in different member states. In some cases information systems can be

164 implemented based on complex system-to-system connections. Complex system-to-system

165 connections means a lot of work when there are changes in some systems.

166

167 Here we can calculate connections based on number of information systems.

168

169 1 x 28 member state systems = 28 systems

170 5 x 28 member state systems = 140 systems

171 10 x 28 member state systems = 280 systems

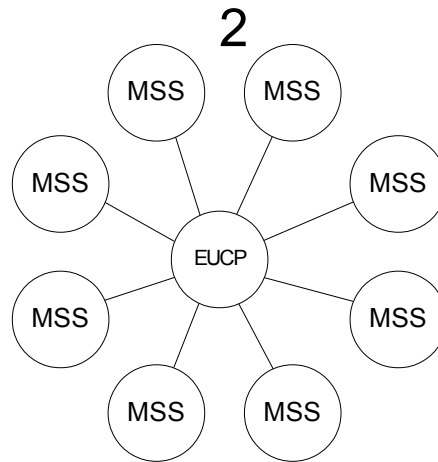
172 15 x 28 member state systems = 420 systems

173 20 x 28 member state systems = 560 systems.

174 28 x 30 member state systems = 840 systems

175

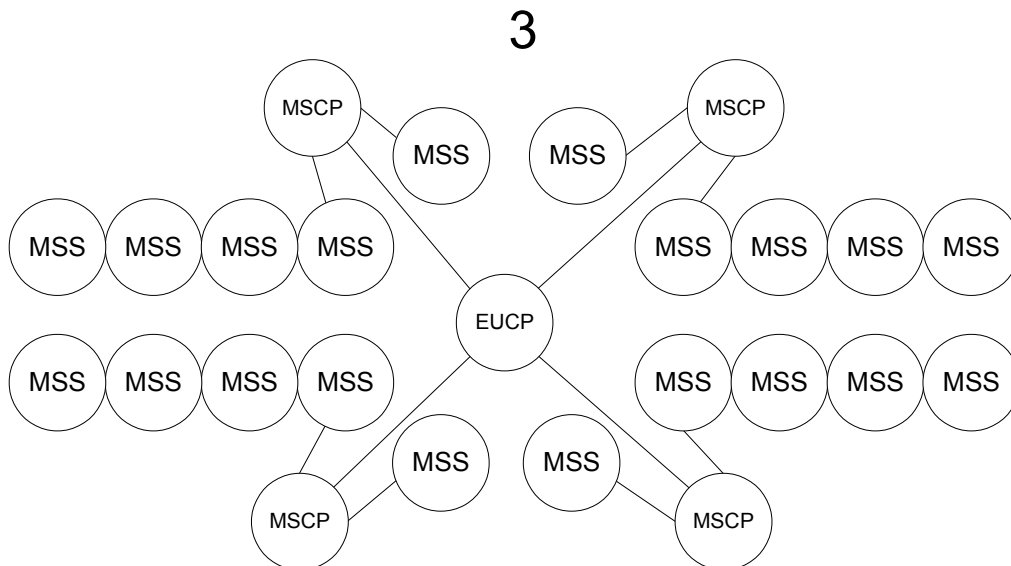
176 **Proposal: Complex system-to-system connections implemented in information systems**
 177 **could be assessed carefully.**



MSS = Member State System
EUCP = European Contact Point

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Naturally there could be direct contacts between different member state systems (MSS) and European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large number of different member state system. Based on 28 member state systems there could be hundreds of connections. One option is to have a single European contact point for member state systems. Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MCP). Then there can be some hierarchy between different systems. (European Union ↔ EUCP ↔ MSCP ↔ MSS ↔ Member State). There are unique situations with member statesystems in member states. Therefore member state contact points (MCP) can reduce the complexity with European Union contact point (EUCP).



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

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 194

195

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

199

200 I have proposed several times creation of member state contact points which could handle different
201 system-to-system connections at member state level. Then it can be easier to create connections
202 between member state contact points and European contact point.

203

204 **Proposal: There could be one information system (member state contact point, MSCP)**
205 **at member state level.**

206

207 **Proposal: Different member state systems could be consolidated based on limited**
208 **number system-to-system connections (MSCP ↔ MSS).**

209

210 **Proposal: One information system (member state contact point, MSCP) at member**
211 **state level could handle system-to-system connections at the European Union level**
212 **(European contact point) (EUCP ↔ MSCP).**

213

214 **Proposal: There could be some serious work for developing a standardised member**
215 **state contact points (MSCP).**

216

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

219

220 **Proposal: European Union contact point (EUCP) and member state contact points**
221 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at the European**
222 **Union level.**

223

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

229

230 **About different identifiers (ID)**

231

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

235

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

238

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

240

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

244

245 Examples of these identifiers (ID) are following:

246

- 247 1) Facebook ID for an individual person
- 248 2) Facebook ID for the individual updates of individuals
- 249 3) Data Universal Numbering System (D-U-N-S)
- 250 4) Reuters instruments codes (RICs)
- 251 5) Social security code for individual citizens in the European Union member states
- 252 6) Business identity code for a company in an European Union member state
- 253 7) Value added tax code for a company in an European Union member state.

254

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

258

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

261

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

264

265 Different information systems have also internal identifiers (ID) and external identifiers (ID) for
266 (possible) public usage. The added value for different stakeholders is provided by combination of
267 different identifiers (ID) in a specific information system.

268

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

271

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

275

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

277

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

281

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

283

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

285

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

289

290 **Organising more technical consultations?**

291

292 **Proposal: Directorate-General for Communications Networks, Content and**
293 **Technology could organise more technically oriented consultations based on results of**
294 **this consultations.**

295

296 Some possible issues for new consultations could be following:

297

298 * **identifiers at different levels (member state, European Union, global)**

299

300 * **database structures**

301

302 * **assessment of different standards – open and closed**

303

304 * **technical consultation about usable technologies.**

305

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307 I have advocated usage of web feeds ² on several previous opinion documents. Actually there are
308 two standards for web feeds: RSS ^{3 4} and Atom ^{5 6 7}.

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

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

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

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

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

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

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

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

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

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

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

324

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

329

330

331

332 **Good luck!!!**

333

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

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338 [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

- 385 EN: Opinion 19: Official Acknowledgement by the Commission
386 http://www.jukkarannila.fi/lausunnot.html#nro_19
387
- 388 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
389 http://www.jukkarannila.fi/lausunnot.html#nro_20
390
- 391 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
392 http://www.jukkarannila.fi/lausunnot.html#nro_21
393
- 394 EN: Opinion 23: Public consultation on the review of the European Standardisation System
395 http://www.jukkarannila.fi/lausunnot.html#nro_23
396
- 397 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
398 http://www.jukkarannila.fi/lausunnot.html#nro_27
399
- 400 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
401 http://www.jukkarannila.fi/lausunnot.html#nro_28
402
- 403 EN: Opinion 30: Internet Filtering
404 http://www.jukkarannila.fi/lausunnot.html#nro_30
405 NOTE: Organised by the European Committee for Standardization (CEN) ⁸
406
- 407 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
408 http://www.jukkarannila.fi/lausunnot.html#nro_32
409
- 410 EN: Opinion 34: REMIT Registration Format
411 http://www.jukkarannila.fi/lausunnot.html#nro_34
412 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁹
413
- 414 EN: Opinion 35: Exploiting the employment potential of the personal and household services
415 http://www.jukkarannila.fi/lausunnot.html#nro_35
416
- 417 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
418 http://www.jukkarannila.fi/lausunnot.html#nro_37
419
- 420 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
421 http://www.jukkarannila.fi/lausunnot.html#nro_39
422
- 423 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
424 http://www.jukkarannila.fi/lausunnot.html#nro_40
425
- 426 EN: Opinion 41: AT.39398: observations on the proposed commitments
427 http://www.jukkarannila.fi/lausunnot.html#nro_41

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

⁹ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 428
429 EN: Opinion 42: Opening up Education
430 http://www.jukkarannila.fi/lausunnot.html#nro_42
431
432 EN: Opinion 43: Publication of extracts of the European register of market participants
433 http://www.jukkarannila.fi/lausunnot.html#nro_43
434 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
435
436 EN: Opinion 44: Evaluation policy guidelines
437 http://www.jukkarannila.fi/lausunnot.html#nro_44
438
439 EN: Opinion 45: About ICT standardisation
440 http://www.jukkarannila.fi/lausunnot.html#nro_45
441
442 EN: Opinion 46: Review of the EU copyright rules
443 http://www.jukkarannila.fi/lausunnot.html#nro_46
444
445 EN: Opinion 51: European Area of Skills and Qualifications
446 http://www.jukkarannila.fi/lausunnot.html#nro_51
447
448 EN: Opinion 52: Trusted Cloud Europe Survey
449 http://www.jukkarannila.fi/lausunnot.html#nro_52
450
451 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
452 http://www.jukkarannila.fi/lausunnot.html#nro_53
453 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
454
455 EN: Opinion 55: European Energy Regulation
456 http://www.jukkarannila.fi/lausunnot.html#nro_55
457 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
458
459 EN: Opinion 59: Green paper on mobile Health
460 http://www.jukkarannila.fi/lausunnot.html#nro_59
461
462 EN: Opinion 60: Cross-border inheritance tax problems within the EU
463 http://www.jukkarannila.fi/lausunnot.html#nro_60
464
465 EN: Opinion 61: European Register of Products Containing Nanomaterials
466 http://www.jukkarannila.fi/lausunnot.html#nro_61
467
468 EN: Opinion 64: Corporate Social Responsibility - European Commission
469 http://www.jukkarannila.fi/lausunnot.html#nro_64
470
471 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
472 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 473
474 EN: Opinion 68: European Network Code Stakeholder Committees
475 http://www.jukkarannila.fi/lausunnot.html#nro_68
476 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
477
478 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
479 http://www.jukkarannila.fi/lausunnot.html#nro_71
480 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
481
482 EN: Opinion 74: Enabling the Internet of Things
483 http://www.jukkarannila.fi/lausunnot.html#nro_74
484 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ¹⁰
485
486 EN: Opinion 80: Mandatory Transparency Register
487 http://www.jukkarannila.fi/lausunnot.html#nro_80
488
489 EN: Opinion 84: Revision of the European Interoperability Framework
490 http://www.jukkarannila.fi/lausunnot.html#nro_84
491
492 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
493 http://www.jukkarannila.fi/lausunnot.html#nro_86
494
495 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
496 http://www.jukkarannila.fi/lausunnot.html#nro_88
497
498 EN: Opinion 89: BEREC Guidelines for net neutrality rules
499 http://www.jukkarannila.fi/lausunnot.html#nro_89
500 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
501
502 EN: Opinion 93: Safety of apps and other non-embedded software
503 http://www.jukkarannila.fi/lausunnot.html#nro_93
504
505 EN: Opinion 95: Targeted consultation on eForms
506 http://www.jukkarannila.fi/lausunnot.html#nro_95
507
508 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
509 http://www.jukkarannila.fi/lausunnot.html#nro_97
510
511 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
512 http://www.jukkarannila.fi/lausunnot.html#nro_98
513
514 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
515 Regulators. Recast
516 http://www.jukkarannila.fi/lausunnot.html#nro_99

¹⁰ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 517
518 EN: Opinion 100: Protection of personal data (EU)
519 http://www.jukkarannila.fi/lausunnot.html#nro_100
520
521 EN: Opinion 101: Governance of the Energy Union
522 http://www.jukkarannila.fi/lausunnot.html#nro_101
523
524 EN: Opinion 102: Smart Wearables
525 http://www.jukkarannila.fi/lausunnot.html#nro_102
526
527 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
528 (ENISA)
529 http://www.jukkarannila.fi/lausunnot.html#nro_106
530
531 EN: Opinion 108: Single Digital Gateway
532 http://www.jukkarannila.fi/lausunnot.html#nro_108
533
534 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
535 http://www.jukkarannila.fi/lausunnot.html#nro_110
536
537 EN: Opinion 111: Interoperability of information systems for migration and security
538 http://www.jukkarannila.fi/lausunnot.html#nro_111
539
540 EN: Opinion 113: Transform of health and care
541 http://www.jukkarannila.fi/lausunnot.html#nro_113
542
543 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
544 Internet
545 http://www.jukkarannila.fi/lausunnot.html#nro_114
546 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
547
548 EN: Opinion 118: Fake news and online disinformation
549 http://www.jukkarannila.fi/lausunnot.html#nro_118
550
551 EN: Opinion 119: European Social Security Number
552 http://www.jukkarannila.fi/lausunnot.html#nro_119
553
554 EN: Opinion 120: European Labour Authority
555 http://www.jukkarannila.fi/lausunnot.html#nro_120
556
557 EN: Opinion 121: 2nd Data Package
558 http://www.jukkarannila.fi/lausunnot.html#nro_121
559
560
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563 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European

564 Cybersecurity Research and Competence Centre

565 http://www.jukkarannila.fi/lausunnot.html#nro_122

566

567 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF

568 THE COUNCIL on the re-use of public sector information (recast)

569 http://www.jukkarannila.fi/lausunnot.html#nro_123

570

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

572 http://www.jukkarannila.fi/lausunnot.html#nro_125

573

574 EN: Opinion 128: Summertime arrangements

575 http://www.jukkarannila.fi/lausunnot.html#nro_128

576

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

578 http://www.jukkarannila.fi/lausunnot.html#nro_129

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583 My opinions to the previous and relevant consultations – there consultations were mostly organised
584 by the European Commission. General page to all consultations – both in English and in Finnish:585 <http://www.jukkarannila.fi/lausunnot.html>

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