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ENTR-ICT-STANDARDISATION@ec.europa.eu
EC-ICT-STD-ROLLING-PLAN@EC.EUROPA.EU

European Commission
DG Enterprise and Industry

OPINION / PUBLIC CONSULTATION ON ICT STANDARDISATION

First of all, a lot of thanks to the European Commission (Commission) of organising this important consultation about ICT standardisation.

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.

The Commission can add PDF file of this opinion to a relevant Commission web page.

Annex 1 holds information about previous opinions in the EU level.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

41

42 **1. General: Previous consultations**

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44 Annex 2 is a list of my ¹ previous opinions, which are mostly addressed to different Directorate-
 45 Generals of the European Commission. Some parts of the previous opinions can be used in this
 46 opinion.

47

48 **2. Amount of documents related to this opinion.**

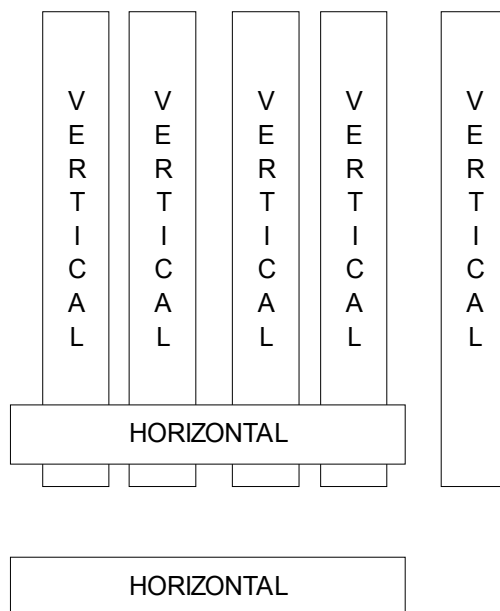
49

50 From the ² consultation web page it is possible to download several documents, and the amount of
 51 the pages in those documents can be overwhelming for some stakeholders.

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53 **3. The main theme: horizontal standards and vertical standards**

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56

57 One of the main themes can be division standards: **horizontal standards and vertical standards.**
 58 What this means? Generally speaking, different ICT solutions will implement a large collection of
 59 different standards: open standards and closed standards. In many cases, different ICT solutions do
 60 not work together and this might not constitute a problem. However, in many cases different ICT
 61 solutions has to work together seamlessly – possibly without further problems.

62

63 **Proposal 1: There could be separation of horizontal standards and vertical standards.**

64

65 **Proposal 2: There could be different standardisation efforts to horizontal standards
 66 and vertical standards.**

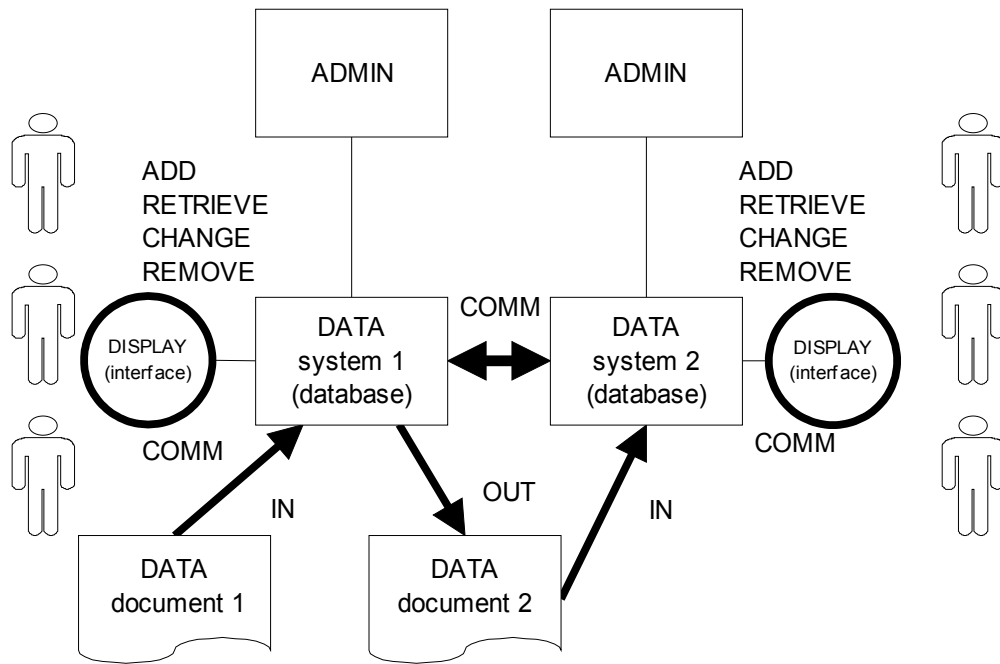
1 <http://www.jukkarannila.fi/lausunnot.html>, The general page for my formally published opinions

2 <https://ec.europa.eu/digital-agenda/en/news/public-consultations-ict-standardisation>, Public consultations on ICT standardisation, the page was accessible on 18 January 2014

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Proposal 3: Developing horizontal standards should favoured in the development of new and/or revised standards.

4. A simple/general conception of different ICT solutions / Standard classes



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From this simple (figure) conception we can differentiate several standard classes.

- 1) Data (documents) standards
- 2) Data (database) standards
- 3) Standards for adding data to a system.
- 4) Standards for retrieving data from a system.
- 5) Standards for changing data in a system.
- 6) Standards for removing data from a system.
- 7) Display standards
- 8) Interface standards
- 9) Different communication standards.

This actually means at least nine (9) different standard classes, and there can be both open and closed standards in different layers.

Proposal 4: There could be a classification for different (9) standard groups.

Proposal 5: Different standard classes could be emphasised more than others.

94

95 **5. Classification of the standards related to this consultation**

96

97 How to classify the of the standards related to this consultation? Here is my reasoned guess for
98 classification of the standards

99

100 **Data (document) standard:** Extensible Markup Language (XML)101 **Interface standard:** Domain ECMAScript-402 Internationalization API102 **Communication standard:** DomainKeys Identified Mail Signatures (DKIM)103 **Communication standard:** Domain Name System Security Extensions (DNSSEC)104 **Communication standards:** IPv6105 **Interface standard:** LDAPv3

106

107 With XML is possible to create different documents with certain rules, e.g. RSS ³ feed is a
108 document format for distributing data between RSS feed providers and RSS feed reader programs. I
109 estimate that DKIM, DNSSEC and IPv6 can be used together to provide more secure
110 communications between different systems. LDAPv3 provides us an interface to use data from
111 different systems complying with LDAPv3; Those systems may be closed (source code) or open
112 (source code) solutions.

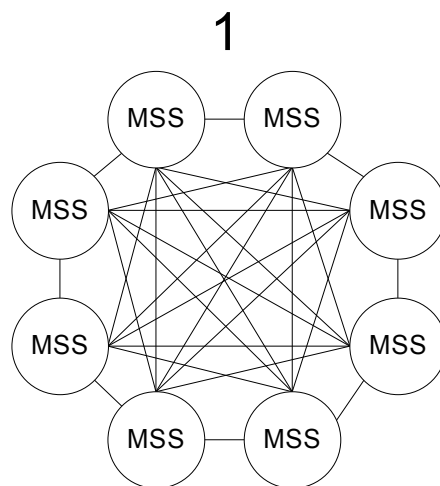
113

114 I estimate, that the standards related to this consultation can be considered as horizontal standards.

115

116 **6. Current reality in the European Union level and in the member states**

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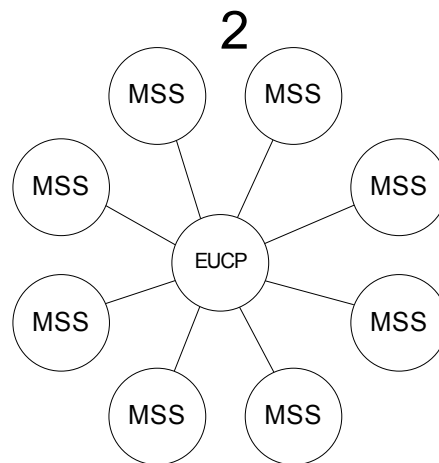
120 In member states there are thousands of different informations systems (MSS = as member state
121 information system). It can be concluded, that these systems are layered in different ways and
122 implement several standard (technology) generations. Generally speaking, there can be several
123 many-to-many connections, which are very cumbersome to implement and maintain.

3 <http://www.rssboard.org/rss-specification>, the page was accessible on 18 January 2014

124

125 In the European Union level there is need to extract information from different member state
 126 systems, and then there is a European contact point (EUCP) for this cooperation between different
 127 information systems.

128

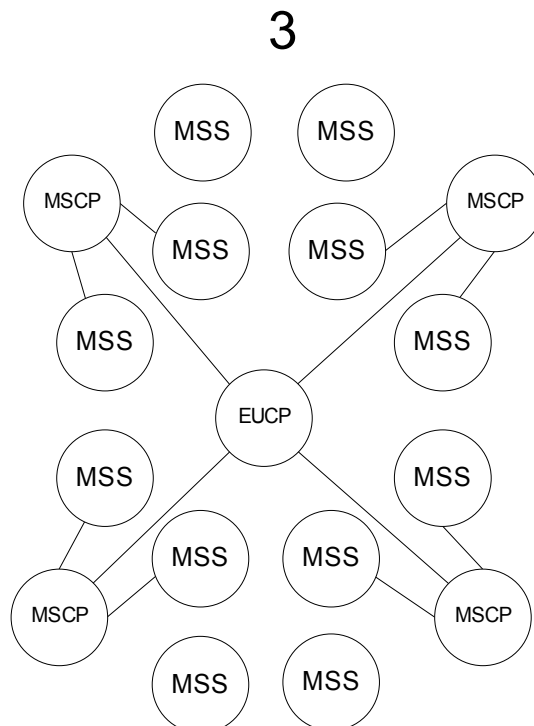


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131 This situation can be solved also with a member state contact point (MSCP), which is then
 132 connected to a European Union contact point (EUCP).

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136 In previous consultations I have advocated of creating separate member state contact points
 137 (MSCP) and a separate European Union contact point (EUCP). In this way it easier for member
 138 state to consolidate different information system with their own timetable.

139

140 **Proposal 6: The Commission should start implementing the proposed standards (in
 141 this consultation) from European Union contact point(s) (EUCP) to member state
 142 contact points (MSCP).**

143

144 It could be like this: EUCP → MSCP → MSS. There has to be a lot of patience when implementing
 145 different standards in member state systems (MSS); this work will take years since the quality and
 146 quantity of different information systems vary in different member states.

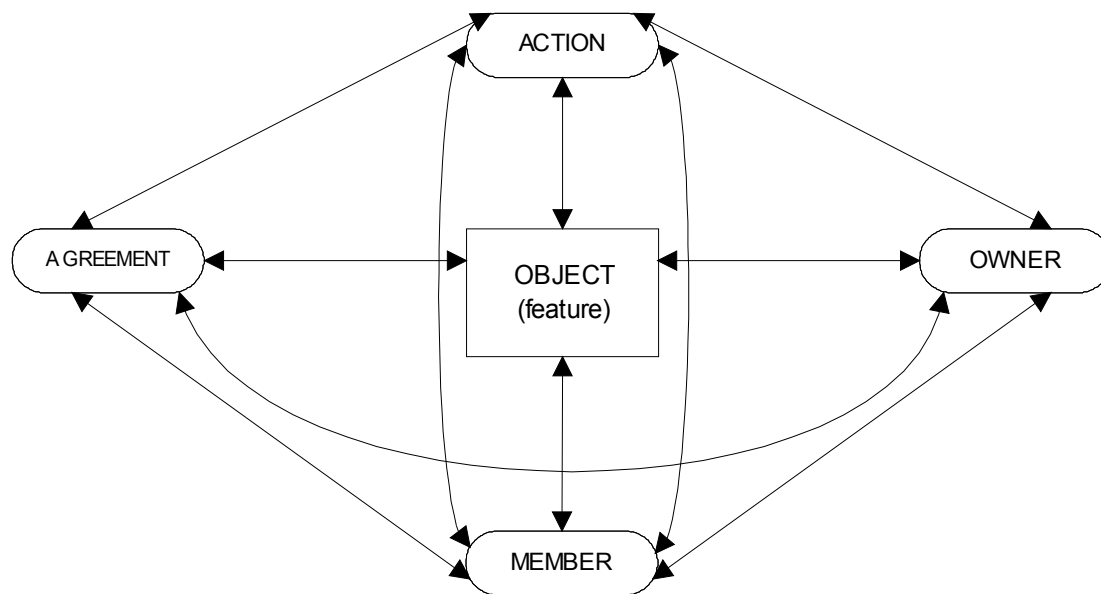
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148 **7. Differentiations between agreement, owners and members.**

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150 In this case we can conclude, that the objects are different information (technology) systems.

151



152

153

154 In a information system there are a numerous features implemented; these features can be based on
 155 agreements, ownership or membership. Also, there is a complex web of combinations among
 156 agreements, ownership or membership. Generally speaking, we use different information systems
 157 without considering agreements, ownership or membership related to a specific solution.

158

159 **Proposal 7: The Commission could reveal complex webs of combinations among
 160 agreements, ownership or membership in different application fields.**

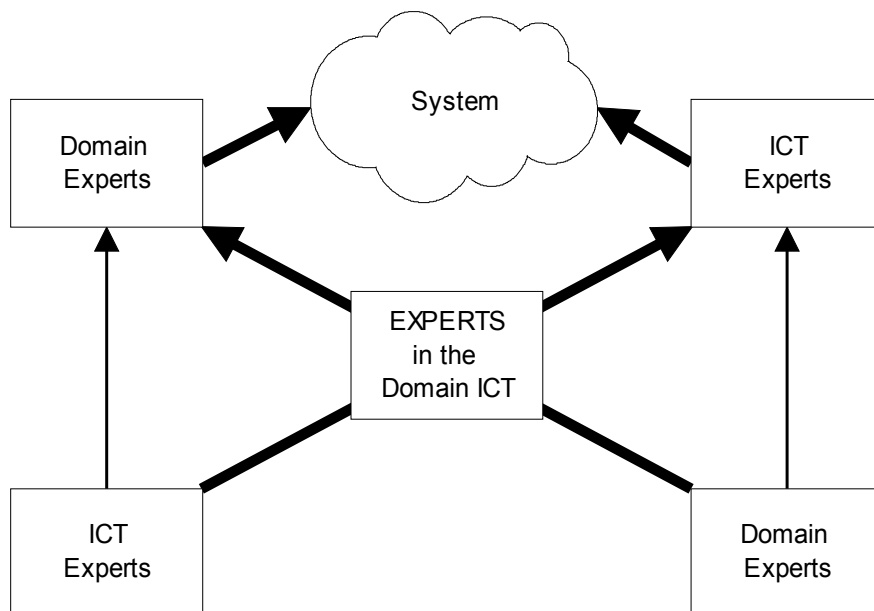
161

162 The Rolling plan for ICT standardisation (2013) is a good starting point, but it does not provide a
 163 rigorous assessment of agreements, ownership or membership in different application fields.

164

165

166 The problem is naturally the needed knowledge in different domains, since in all domains there are
167 several problematic issues related to agreements, ownership or membership.
168



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170

171 This consultation is a good starting point for assessing needed ICT standardisation in different
172 domains (Domain ICT). Like said before, the quality and quantity of different member state
173 information system varies significantly.
174

175

176 **Proposal 8: The Commission could assess ICT standardisation in different domains**
177 **(Domain ICT) and classify the needed ICT standardisation efforts based on the**
178 **urgency in different domains.**

179

180 This consultation is mainly about general ICT standards, and applying those ICT standards in
181 different domains (Domain ICT) can actually be very hard. Like said before, different domains have
182 their unique situation between agreements, ownership or membership.

183

184 **Good luck!**

185

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

187

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ANNEX 1

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190

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

194

195

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

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

198

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

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

201

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

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

205

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

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

208

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

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

211

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

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

214

215 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
216 proposal for comments

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

218

219 EN: Opinion 15: Collective Redress

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

221

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

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

224

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

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

227

228 EN: Opinion 19: Official Acknowledgement by the Commission

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

230

231 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft

- 232 http://www.jukkarannila.fi/lausunnot.html#nro_20
233
234 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
235 http://www.jukkarannila.fi/lausunnot.html#nro_21
236
237 EN: Opinion 23: Public consultation on the review of the European Standardisation System
238 http://www.jukkarannila.fi/lausunnot.html#nro_23
239
240 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
241 http://www.jukkarannila.fi/lausunnot.html#nro_27
242
243 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
244 http://www.jukkarannila.fi/lausunnot.html#nro_28
245
246 EN: Opinion 30: Internet Filtering
247 http://www.jukkarannila.fi/lausunnot.html#nro_30
248 NOTE: Organised by the European Committee for Standardization (CEN) ⁴
249
250 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
251 http://www.jukkarannila.fi/lausunnot.html#nro_32
252
253 EN: Opinion 34: REMIT Registration Format
254 http://www.jukkarannila.fi/lausunnot.html#nro_34
255 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁵
256
257 EN: Opinion 35: Exploiting the employment potential of the personal and household services
258 http://www.jukkarannila.fi/lausunnot.html#nro_35
259
260 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
261 http://www.jukkarannila.fi/lausunnot.html#nro_37
262
263 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
264 http://www.jukkarannila.fi/lausunnot.html#nro_39
265
266 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
267 http://www.jukkarannila.fi/lausunnot.html#nro_40
268
269 EN: Opinion 41: AT.39398: observations on the proposed commitments
270 http://www.jukkarannila.fi/lausunnot.html#nro_41
271
272 EN: Opinion 42: Opening up Education
273 http://www.jukkarannila.fi/lausunnot.html#nro_42
274

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

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

275 EN: Opinion 43: Publication of extracts of the European register of market participants

276 http://www.jukkarannila.fi/lausunnot.html#nro_43

277

278 EN: Opinion 44: Evaluation policy guidelines

279 http://www.jukkarannila.fi/lausunnot.html#nro_44

280

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282 My opinions to the previous and relevant consultations – there consultations were mostly organised

283 by the Commission of the European Union. General page to all consultations – both in English and

284 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

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329



6 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.