1
2 TO:
3 onlineharmsconsultation@culture.gov.uk
4 Online Harms Team
5
6
7 **Consultation: Online Harms White Paper**
8
9 First of all, a lot of thanks to Online Harms Team for organising this important consultation.
10
11 This opinion represents an opinion of an individual citizen, not any legal entity.
12
13 This opinion does not contain:
14   –   any business secrets
15   –   any trade secrets
16   –   any confidential information.
17
18 This opinion is public.
19 PDF file of this opinion can be added to a relevant web page.
20
21 Annex 1 holds information about disclaimers and copyright.
22
23
24
25 Best Regards,
26
27
28
29 Jukka S. Rannila
30 citizen of Finland
31
32 signed electronically
33
34
35
36 [Continues on the next page]
37

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38
39   **General page for my opinions**
40
41   General web page for my opinions is following:
42   http://www.jukkarannila.fi/lausunnot.html
43
44   **Consultation document is very extensive / Only some issues handled**
45
46   The consultation document for this consultation is very extensive (Online Harms White Paper, April
47   2019). I handle only some issues mentioned on the consultation document.
48
49   **About European Union / United Kingdom / Exit / European Union**
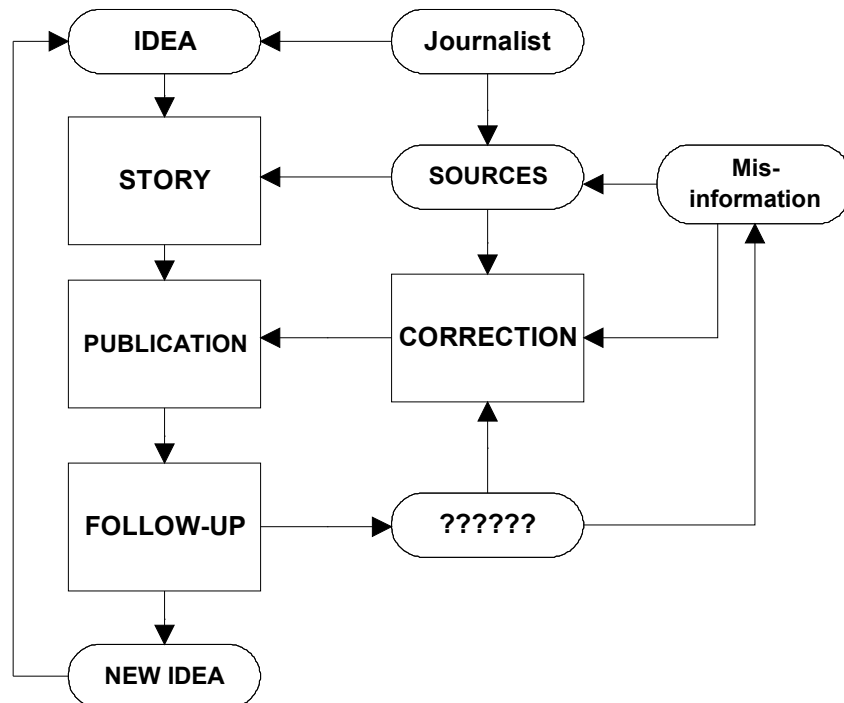50
51   We know at the moment that United Kingdom is leaving the European Union in the future. This
52   opinion handles partially European Union issues and also issues at the national level. Therefore
53   readers of this opinion can assess national (outside the European Union) issues.
54
55   **Misinformation / What to do?**
56

57
58
59   One clear problem is misinformation. Also correcting different misinformed claims should be
60   handled efficiently. Problem of misinformation is accelerated since electronic networks can spread
61   misinformation very efficiently.
62
63   **The general aim: pursuit for the truth / truth-seeking**

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64
65 The truth is, that misinformation can spread nowadays instantly around the Internet. Therefore, the
66 truth-seeking endeavours are facing yet another problem, i.e. distortion by the general
67 misinformation.
68
69 There are some interesting examples of truth-seeking endeavours organised outside the European
70 Union:
71   * PolitiFact [1]
72   * PolitiFact Australia [2]
73   * FactCheck.org [3]
74   * The Fact Checker [4].
75
76 It can be said, that PolitiFact has a reputational brand, and the brand is now expanded to Australia.
77 All these four examples are organised differently. (e.g. a foundation, a private company). Also, there
78 a some (non-profit) institutions supporting investigative journalism. Naturally, there are different
79 site for leaking different classified material to the public, e.g. [5] Wikileaks.
80
81 The aim is the same with different organising modes: serious truth-seeking.
82
83 **schema.org → ClaimReview standard for transferring fact-checking reviews of claims**
84
85 Here we can note ClaimReview standard for transferring fact-checking reviews of claims
86 (http://schema.org/ClaimReview). This standard explicates several data fields which are needed for
87 assessing truthfulness of different claims.
88
89 Naturally there are mismatches between claims and reviews of claims. One claim can be forwarded
90 very fast. Claim reviews mean a lot of work and claim reviews can be forwarded rather slowly.
91
92 **Examples of identifiers (ID) based on scientific communication**
93
94 Following identifiers can be presented:
95   DOI [6]
96   ORCID [7]
97   ResearcherID [8]
98   Scopus Author ID [9]
99   ISNI [10]

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1 http://www.politifact.com/about/, About PolitiFact
2 http://www.politifact.com.au/, PolitiFact Australia
3 http://www.factcheck.org/, FachCheck.org
4 http://www.washingtonpost.com/blogs/fact-checker, The Fact Checker / Washington Post
5 http://wikileaks.org/About.html, About WikiLeaks
6 http://www.doi.org
7 https://orcid.org
8 http://www.researcherid.com
9 https://www.scopus.com/freelookup/form/author.uri
10 http://www.isni.org

100
101 DOI is identifier (ID) for scientific articles. ORCID, ResearcherID and Scopus Author ID are
102 identifiers (ID) for scientists. ISNI is identifier (ID) for contributors to creative works generally.
103
104 What we can learn from these identifiers (DOI, ORCID, ResearcherID, Scopus Author ID, ISNI)?
105
106 Here we can note following issues:
107
108   1)   specific (scientific) articles can be pinpointed clearly
109   2)   different scientist can be pinpointed clearly
110   3)   there can be non-profit organisations for developing different identifiers
111   4)   there can be commercial organisations for developing different identifiers.
112   5)   there can be different identifiers for the same issue, e.g. global and national
113   6)   there can be some redundancy of different identifiers.
114
115 Each DOI is unique and permanent. A document keeps the same DOI for its entire lifetime and, if
116 ever the document is deleted, the DOI will not be reused. An example of the DOI identifier can
117 presented.
118
119   **doi:10.2788/14231**
120
121 The prefix (before slash) is assigned to an organisation which can register DOI names. Following
122 the prefix (separated by a forward slash) is the suffix (unique to a given prefix) to identify the
123 entity.
124
125 Resolving a DOI name can be done on the following web page
126
127   https://dx.doi.org
128   → an example → add 10.2788/14231 to the search field.
129   → this leads to actual web page of that publication (doi:10.2788/14231).
130
131 Like said before DOI means unique identifiers for scientific articles and one DOI user is
132 Publications Office of the European Union (Publications Office).
133
134 **Proposal for identifiers (ID) for media solutions**
135
136 Based on the previous ideas of identifiers (ID) there could be following issues when creating
137 different identifiers (ID) for media solutions:
138   •   identifiers (ID) for media organisations (e.g. newspaper or television
139   channel)
140   •   identifiers (ID) for journalists
141   •   identifiers (ID) for stories provided by media organisations
142   •   identifiers (ID) for corrections of different stories.
143
144   **Proposal: A serious assessment of different identifiers (ID) for media solutions could be**

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145   **done carefully.**
146
147   Naturally following identifiers (ID) could be assessed:
148
149   •   **global identifiers (ID)**
150   •   **EU-wide identifiers (ID)**
151   •   **general member state (EU) identifiers (ID)**
152   •   **several identifiers (ID) in members states (EU)**
153   •   **identifiers outside the European Union.**
154
155   Based on examples of identifiers (ID) of scientific publications there could be similar efforts.
156
157   **National level?**
158
159   It can be concluded, that a specific story in the national in a member state is actually distributed in
160   several systems in a member state. Different member state systems (MSS) are then integrated in
161   different layers. In other words, the original is distributed totally and partially to several systems.
162
163   Like said before, one (or more) of the systems can be a special system for correcting the
164   misinformation distributed in different stories.
165
166   At the national level (member state) there is a need at least for the following information:
167
168   •   clear identifier for an original story
169   •   original story without modifications
170   •   modification(s) added later to the original story
171   •   originator(s) of a story
172   •   factual references of a story
173   •   original distributor of a story
174   •   members (persons / communities) in a story
175   •   references to previous story / stories
176
177   On the other hand, the misinformation can spread also, and there could be the following
178   information:
179
180   •   clear identifier for the found misinformation
181   •   original (misinformation) story without modifications
182   •   modification(s) added later to the original (misinformation) story
183   •   originator(s) of a (misinformation) story
184   •   factual references of a (misinformation) story
185   •   non-factual references of a (misinformation) story
186   •   original distributor of a (misinformation) story
187   •   members (persons / communities) in a (misinformation)story.
188
189   Naturally, there has to be identifier for person / community, who / which has made a evaluation of a

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190 story and the amount of misinformation in a story. Therefore some more additions:
191
192   •   person / community responsible for evaluating the amount of misinformation
193   in a story.
194
195 It can be said, that depending on the situation in a specific member state, misinformation
196 distributing efforts are covered rather fast. E.g. in Finland different media actors are quite eager to
197 point mistakes in stories provided by other media actors.
198
199 **Media pluralism – possible problems?**
200
201 One issue is naturally "new" media which is not like "traditional" media. "New" media can be
202 internet-only solutions and possibly not following guidelines for journalist; e.g. in Finland we have
203 guidelines [11] for journalists and an annex (Material generated by the public on a media website).
204
205 Naturally there should be journalistic freedom when publishing news based on different viewpoints.
206
207 **One centre (European centre?) for informing different information technology problems**
208
209 I have advocated one center for informing different information technology problems. At the
210 moment there are several possibilities for informing different information technology problems.
211
212 Examples for informing information technology problems are following:
213
214   •   Spamhouse Project [12] for tracking email spammers and spam-related activity
215   •   SpamCop [13] service for reporting spam
216   •   Common Vulnerabilities and Exposures (CVE) [14] for informing information-security
217   vulnerabilities and exposures
218   •   Forum of Incident Response and Security Teams [15]
219   •   computer emergency response team (CERT) – also national CERT teams
220   •   CSIRT Virus Watch [16]
221   •   Scamdex [17]
222   •   providers of different technology solutions have their own reporting services.
223
224 There is one note on inception impact assessment document about fragmentation of the effort, lack
225 of a dynamic EU-wide ecosystem.
226
227   **Proposal: There could be some work for creating just one service for informing**
228   **different information technology problems.**

11 http://www.jsn.fi/en/guidelines_for_journalists/
12 https://www.spamhaus.org
13 https://www.spamcop.net
14 http://cve.mitre.org
15 https://www.first.org
16 http://www.csirt.org
17 http://www.scamdex.com

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229
230   **Proposal: Possibly there could be just one service for informing different information**
231   **technology problems.**
232
233   Like said before (also based on previous opinions) there can be several solutions for informing
234   different information technology problems. Possibly different services are not connected to other
235   systems.
236
237   **More and more identifiers (ID)**
238
239   In the previous consultations there has been discussion about different identifiers (ID) in different
240   systems. It can be noted from the previous opinions, that there will be several and different
241   identifiers (ID) for different levels. At the European Union level there can be several identifiers
242   (ID), e.g. following:
243
244   * global identifiers (ID)
245   * EU-wide identifiers (ID)
246   * general member state identifiers (ID)
247   * several identifiers (ID) in member states.
248
249   **Proposal: There could be a systematic review of different identifiers (ID).**
250
251   It can be noted, that some member states (EU) are federations, and different federal states can have
252   their own identifiers (ID).
253
254   Examples of these identifiers are following:
255
256   1) Facebook ID for an individual person
257   2) Facebook ID for the individual up-dates of individuals
258   3) Data Universal Numbering System (D-U-N-S)
259   4) Reuters instruments codes (RICs)
260   5) Social security code for individual citizens in the European Union member states
261   6) Business identity code for a company in an European Union member state
262   7) Value added tax code for a company in an European Union member state.
263
264   The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
265   Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
266   of using IDs from privately owned information systems.
267
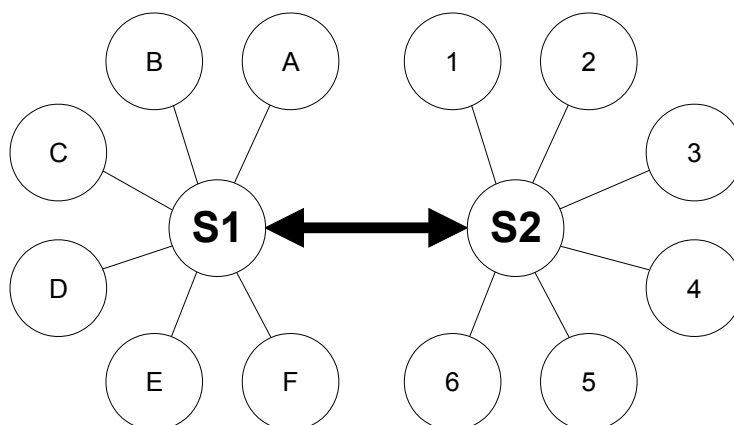268   **More new identifiers (ID)?**
269
270   The current reality is, that there will be more and more IDs, since digitalisation of different areas
271   will result new IDs and/or combination of new and old IDs.
272
273   The creation YET another public ID is not always organised by the European Union, and in some

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274 cases the European Union (and member states) just have to accept the reality of some of those
275 public IDs – in some cases even private IDs are the norm. The Reuters Instrumens Codes (RICs) is
276 an example of a near monopoly situation, and some of current private IDs might constitute (near)
277 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
278 General, and it will be interesting to see possible new cases related to private IDs.
279

1-2

280
281
282   **Note: Digitalisation of everything means more identifiers (ID).**
283
284   **Note: All new identifiers (ID) mean more work for developing existing and new**
285   **informations systems.**
286
287   **Note: There can be new stakeholder groups in the near/distant future which**
288   **mean more identifiers (ID).**
289
290   **Proposal: The could be some assessment(s) based on different versions of different**
291   **identifiers (ID).**
292
293 **Open horizontal standards**
294
295 There are differences between horizontal and vertical standards. A simple example is naturally
296 email solutions. There are several vertical standards when creating technically email solutions. Then
297 there are horizontal standards which enable sending messages between technically different email
298 solutions. Horizontal standards enables technological solutions which can work together. Horizontal
299 standards hides different complexities in information systems.
300
301   **Proposal: There could be assessment of vertical and horizontal standards.**
302
303   **Proposal: Using horizontal standards could be favoured when creating different**
304   **information systems.**

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305
306   **Opinion: The number of redundant standardisation efforts should be minimal.**
307
308   **Proposal: There could be separation of horizontal standards and vertical standards.**
309
310   **Proposal: There could be different standardisation efforts to horizontal standards and**
311   **vertical standards.**
312
313 Personally I have advocated using different horizontal standards. For example email standards
314 (horizontal) are implemented with very different technologies (vertical).
315
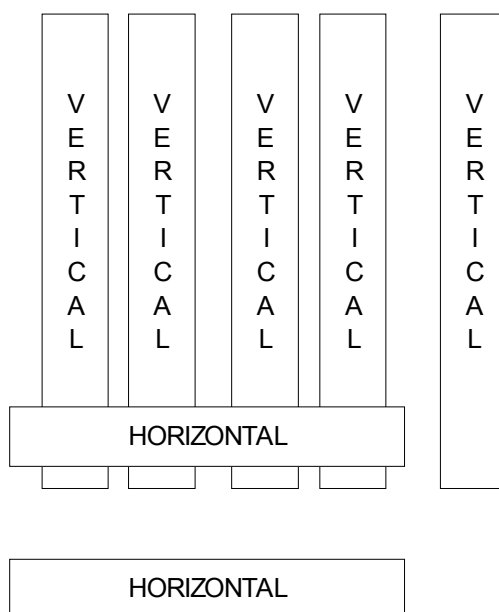
316
317
318   **Proposal: Governments should especially concentrate on horizontal standards.**
319
320   **Proposal: Some government agencies could apply for memberships of different**
321   **standard setting organisations which develop especially horizontal standards.**
322
323 Here we can note some problems:
324
325   •   some systems are based on **de-facto** standards
326   •   some systems are based on **de-jure** standards
327   •   there can be confrontations between **de-facto** and **de-jure** standards
328   •   there can be a monopoly situation in some domain
329   •   some standards may inhibit possible actions of some stakeholders
330   •   there can be a standard war on some domains
331   •   standards have different life-cycles
332   •   systems have different life-cycles

333   •   there can be mismatches between different life-cycles
334   •   there can be failed standards
335   •   there can be deprecated standards.
336
337   It is quite normal situation in the information technology field that there are competing standards
338   for some application field. Therefore there are all the time ongoing "standards wars" or "format
339   wars". The information technology standards tend to be interrelated and one "standards war" or
340   "format war" can lead to another similar situation.
341
342   I have advocated open standards even though in some cases open standards are not de facto
343   standards. In practice public sector has very important role, when some standards are competing in
344   the market place. Because public sector has a considerable power when buying/developing
345   information systems and therefore public sector can sometimes direct markets to certain standards.
346   Therefore there should be serious vigilance when assessing different standards and "standards" in
347   some application fields.
348
349   **An example for cooperation: Web feeds (RSS and Atom)**
350

351
352
353   I have advocated usage of web feeds [18] on several previous opinion documents. Actually there are
354   two standards for web feeds: RSS [19] [20] and Atom [21] [22] [23].
355
356   **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
357   **informations systems (EU / Member states).**
358
359   **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
360   **time) information for different stakeholder(s) (communities).**
361
362   **Proposal: There can be different web feeds (RSS and/or Atom) for different**
363   **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
364   **solution.**
365
366   **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
367
368   It can be easier to create web feeds in different information systems since web feeds enable
369   connections without direct system-to-system connections.

18 https://en.wikipedia.org/wiki/Web_feed
19 http://www.rssboard.org/rss-specification, RSS 2.0 Specification
20 https://en.wikipedia.org/wiki/RSS, Wikipedia / RSS
21 https://en.wikipedia.org/wiki/Atom_(standard), Wikipedia / Atom (standard)
22 https://tools.ietf.org/html/rfc4287, The Atom Syndication Format
23 https://tools.ietf.org/html/rfc5023, The Atom Publishing Protocol

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370
371 It can be noted, that different back-office systems (with a wide variety of different technologies) can
372 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
373 kind solutions front-office systems don´t need direct system-to-system communications with back-
374 office systems.
375
376 **Answers to some specific questions**
377
378 **Question 3:**
379   In what other ways should users be able to tell the regulator about harmful information or
380   activity online?
381
382   **Answer:**
383   **Previously I have advocated just one place and one service for informing different**
384   **information technology problems like online harm.**
385   **United Kingdom could organise just one place and one service for informing different**
386   **information.**
387   **Naturally global cooperation should be assessed carefully.**
388
389 **Question 4:**
390   What role should parliament play in checking the work of the regulator? Should parliament
391   be part of writing the codes of practice?
392
393   **Answer:**
394   European Union has published Code of Practice on Disinformation
395   https://ec.europa.eu/digital-single-market/en/news/code-practice-disinformation
396   **That approach could be assessed by different stakeholders in the United Kingdom.**
397
398   **Answer:**
399   **There could be a specific Code of Practice on Disinformation in the United Kingdom.**
400
401 **Question 7a:**
402   What do you think we should ask private channels for communicating to do, so that we can
403   deal with online harm?
404
405   **Answer:**
406   **Cooperation with private stakeholders can be organised in different ways.**
407   **Private stakeholders can be part of the solution for assessing online harm.**
408
409 **Question 15:**
410   How should the government be a part of dealing with these barriers and opportunities?
411
412   **Answer:**
413   **(1) Government could organise different application programming interfaces (API) for**
414   **different stakeholders.**

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415   **(2) Different stakeholders can provide own interfaces.**
416   **(3) Cooperation between different stakeholders (APIs) can be organised.**
417
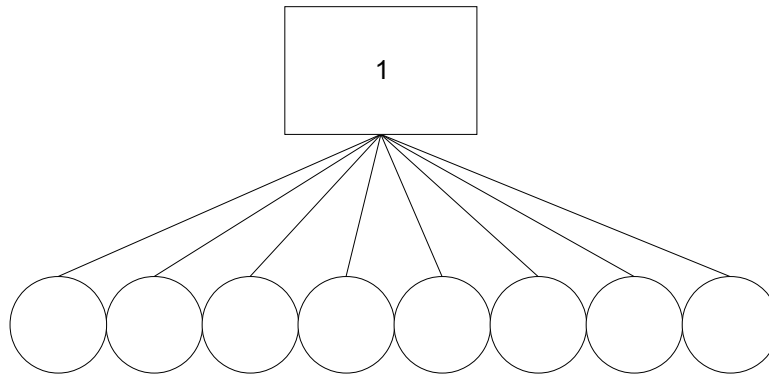
418
419   **Note: there can several application programming interfaces (API) and**
420   **different versions of application programming interfaces (API).**
421   **Note: In practical reality different information systems are layered in**
422   **different ways.**
423   **Note: There can be several standards (formats) for transmitting data**
424
425   **(4) United Kingdom could organise one central system (CS) for reporting online harm.**
426   **(5) Different standard (formats) for reporting online harm could be assessed carefully.**
427
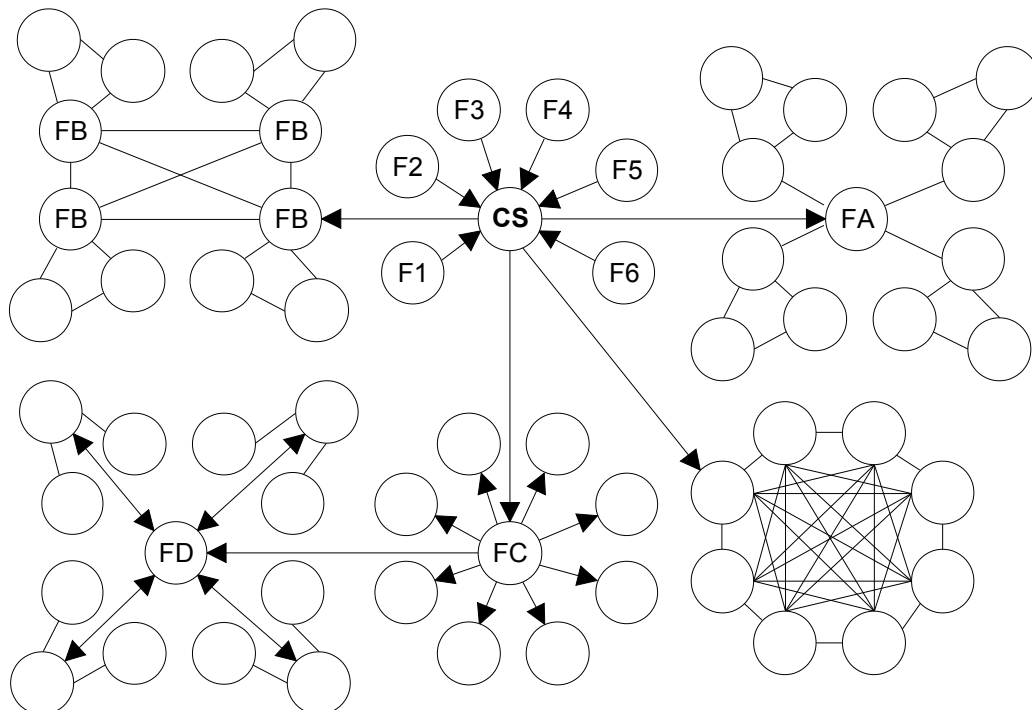
428

429
430   **ANNEX 1**
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473
474