1
2   TO: open-ouvert@tbs-sct.gc.ca
3   Government of Canada
4
5
6   **Draft New Plan on Open Government 2016-2018**
7
8   First of all, a lot of thanks to Government of Canada for organising this important consultantion.
9
10 This opinion represents an opinion of an individual citizen, not any legal entity.
11
12 This opinion does not contain:
13   –   any business secrets
14   –   any trade secrets
15   –   any confidential information.
16
17 This opinion is public.
18
19 Government of Canada can add the PDF file of this opinion to a relevant web page.
20
21 Annex 1 holds information about previous opinions related to information technology.
22 Annex 2 holds information about disclaimers and copyright.
23
24
25
26 Best Regards,
27
28
29
30 Jukka S. Rannila
31 citizen of Finland
32
33 signed electronically
34
35
36 [Continues on the next page]
37

38
39 **Previous consultations about information systems / Annex 1**
40
41 Annex 1 holds a list of previous consultations about information systems.
42
43 Based on previous opinions I have explained several issues in detailed way. It can be noted that
44 some issues are repeated since many consultations concentrated on information technology.
45
46 This opinion does not repeat all previous issues (mainly information technology) mentioned on the
47 previous opinion documents.
48
49 **Commitment 3: Expand and Improve Open Data**
50
51 Here I note that open data means different standards.
52
53 There are different standards setting organisations on the information technology field. One list [1] of
54 these standards setting organisations is provided by ConsortiumInfo.org.
55
56 One warning can be said about standards setting organisations. All standards setting organisations
57 are not successes based on several factors and there can may irrelevant standards setting
58 organisations. Market situation on different vehicle markets varies a lot based on different factors.
59
60 Here we can note some problems:
61
62   •   some systems are based on **de-facto** standards
63   •   some systems are based on **de-jure** standards
64   •   there can be confrontations between **de-facto** and **de-jure** standards
65   •   there can be a monopoly situation in some domain
66   •   some standards may inhibit possible actions of some stakeholders
67   •   there can be a standard war on some domains
68   •   standards have different life-cycles
69   •   systems have different life-cycles
70   •   there can be mismatches between different life-cycles
71   •   there can be failed standards
72   •   there can be deprecated standards.
73
74 It is quite normal situation in the information technology field that there are competing standards
75 for some application field. Therefore there are all the time ongoing "standards wars" or "format
76 wars". The information technology standards tend to be interrelated and one "standards war" or
77 "format war" can lead to another similar situation.
78
79 I have advocated open standards even though in some cases open standards are not de facto
80 standards. In practice public sector has very important role, when some standards are competing in
81 the market place. Because public sector has a considerable power when buying/developing

---

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

82 information systems and therefore public sector can sometimes direct markets to certain standards.
83 Therefore there should be serious vigilance when assessing different standards and "standards" in
84 some application fields.
85
86   **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**
87   **different organisations could be assessed carefully.**
88
89 There are differences between horizontal and vertical standards. A simple example is naturally
90 email solutions. There are several vertical standards when creating technically email solutions. Then
91 there are horizontal standards which enable sending messages between technically different email
92 solutions.
93
94   **Proposal: There could be assessment of vertical and horizontal standards.**
95
96   **Proposal: Using horizontal standards could be favoured when creating different**
97   **information systems.**
98
99 Horizontal standards enables technological solutions which can work together. Horizontal standards
100 hides different complexities in information systems.
101
102   **Opinion: The number of redundant standardisation efforts should be minimal.**
103
104   **Proposal: There could be separation of horizontal standards and vertical standards.**
105
106   **Proposal: There could be different standardisation efforts to horizontal standards and**
107   **vertical standards.**
108
109 Personally I have advocated using different horizontal standards. For example email standards
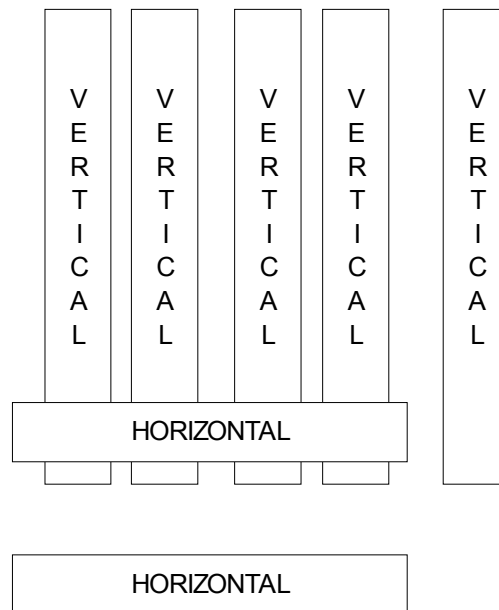110 (horizontal) are implemented with very different technologies (vertical).
111
112
113
114 [Continues on the next page]
115
116
117

```
VERTICAL   VERTICAL   VERTICAL   VERTICAL        VERTICAL

          HORIZONTAL


          HORIZONTAL
```

118
119
120   **Proposal: Governments should especially concentrate on horizontal standards.**
121
122   **Proposal: Some government agencies could apply for memberships of different**
123   **standard setting organisations which develop especially horizontal standards.**
124
125   **Proposal: Government agencies should not be passive by-standers when different**
126   **horizontal standards are developed.**
127
128   **Proposal: Government agencies could financially support development of horizontal**
129   **standards.**
130
131 Here we can note that developing horizontal standards is very demanding compared to developing
132 vertical standards.
133
134 **Commitment 15: Stimulate Innovation through Canada's Open Data Exchange (ODX)**
135
136 One issue is registering different stakeholder groups which use open data.
137
138   **Proposal: Different stakeholders could be registered when they are using open**
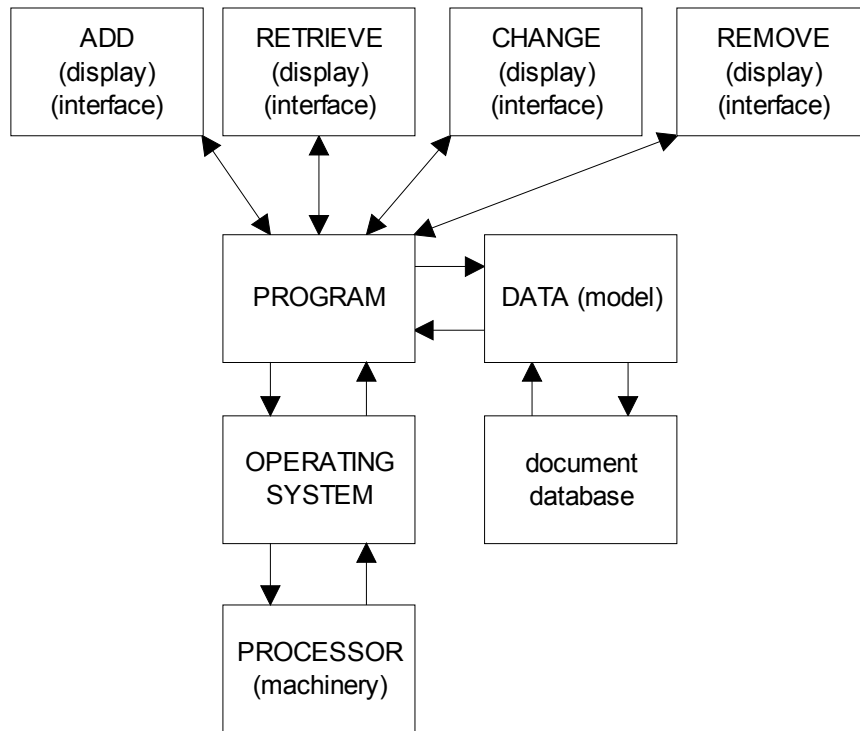139   **governmental data.**
140
141 When different stakeholders are registered there can be some assurances that different changes are
142 informed to stakeholders.
143
144 **Membership, ownership and agreements**
145

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146   Personally I have differentiated owner, members and agreements.
147

```
┌─────────────┐ ┌─────────────┐ ┌─────────────┐ ┌─────────────┐
│    ADD      │ │  RETRIEVE   │ │   CHANGE    │ │   REMOVE    │
│  (display)  │ │  (display)  │ │  (display)  │ │  (display)  │
│ (interface) │ │ (interface) │ │ (interface) │ │ (interface) │
└─────────────┘ └─────────────┘ └─────────────┘ └─────────────┘

              ┌─────────────┐   ┌─────────────┐
              │   PROGRAM   │──▶│ DATA (model)│
              │             │◀──│             │
              └─────────────┘   └─────────────┘

              ┌─────────────┐   ┌─────────────┐
              │  OPERATING  │   │  document   │
              │   SYSTEM    │   │  database   │
              └─────────────┘   └─────────────┘

              ┌─────────────┐
              │  PROCESSOR  │
              │ (machinery) │
              └─────────────┘
```

148
149
150   Generally speaking we have different techniques on the information technology field. Here we can
151   note that programs (most arrows) are in the middle of different information systems. Then programs
152   handle the data in a system (documents and/or databases). However we have to have one specific
153   program which is different – i.e. operating system. Operating systems handle connections with
154   machinery and processors. Generally speaking programs can work with an operating system and
155   developers of programs use different parts of an operating system.
156
157   We have to note that data can have different models and data (models) are developed and/or used by
158   different stakeholders (four basic functions). Especially in databases there are possibilities for
159   several data models; depending on the modellers there can be different data models in databases.
160   Generally speaking changing data models can be very difficult in many cases.
161
162   In the previous consultations I have advocated following solution as the maximum solution:
163
164   * public sector institute owns the machinery and processor of the information system
165   * the machinery and processor are based on relevant open standards
166   * the operating system is based on an open-source solution
167   * public sector institute owns the source code of the information system
168   * public sector institute owns the database of the information system
169   * the database is based on open-source solution and on relevant open standards
170   * public sector institute owns all data in the information system.

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171
172 Naturally, there can be solutions, which are not based on the maximum solution.
173
174 Next table gives us some possibilities for assessing possibilities for open solutions and closed
175 solutions.
176
177   **Note: The relations between different aspects of information systems can result rather**
178   **complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**
179
180   **Proposal: There could be some considerations for assessing possible / future changes in**
181   **ownerships, agreements and memberships.**
182
183 Here we can note the difference between owners, agreements and members. In reality ownerships
184 agreements and memberships cause very complex networks, and those networks are changing all
185 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
186 entities, life-cycles, etc.
187
188 Here we can note that ownership, agreement and membership are interlinked in different ways.
189 Generally speaking average usage of a system means an unique combination of ownership,
190 agreement and membership. When everything works fine there are not problems. However changes
191 with ownership, agreement and membership can result difficult situations.
192

	Owner? Member? Agreement?	OPEN	CLOSED
1. Device / Machinery			
2. Operating system			
3. Program(s)			
4. Data models / Conceptual models			
5. Documents			
6. Databases			
7. Communications			
8. Retrieve / Interface / Display			
9. Add / Interface / Display			
10. Remove / Interface / Display			
11. Change / Interface / Display			

193
194

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195 **Commitment 18: Support Openness and Transparency Initiatives around the World**
196
197 Here we can reiterate difference between vertical and horizontal standards.
198
199　　　**Proposal: Developing horizontal standards should be primary issue for different**
200　　　**initiatives around the world.**
201
202 **Open software and open standards?**
203
204 Previously mentioned horizontal standards can be supported. One issue is software (vertical) which
205 can implement some horizontal standards. Handling open data means using different software.
206
207　　　**Proposal: Providing open data with open software could be favoured.**
208
209 Naturally there can be private software which complies with horizontal standards – this is always
210 possible.
211
212 **Enforcing citizens to use closed software?**
213
214 An example can be different documents provided by government agencies.
215
216　　　**Question: Can government agencies demand usage of closed software when different**
217　　　**documents are sent to citizens?**
218
219　　　**Question: Can government agencies demand usage of closed software when citizens**
220　　　**send documents to government agencies?**
221
222 These questions are very important since a lot computing is about processing different documents.
223
224 Naturally open software can solve this problem but there are also commercial solutions for
225 document processing.
226
227　　　**Proposal: Using open software could be assessed carefully by government agencies.**
228
229 **An example for cooperation: Web feeds (RSS and Atom)**
230

231
232
233/234 I have advocated usage of web feeds on several previous opinion documents. Actually there are two

235   standards for web feeds: RSS [2] [3] and Atom [4] [5] [6].
236
237   **Proposal: Web feeds could be advocated when developing different informations**
238   **systems.**
239
240   **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
241   **time) information for different stakeholder(s) (communities).**
242
243   **Proposal: There can be different web feeds (RSS and/or Atom) for different**
244   **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
245   **solution.**
246
247   **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
248
249   It can be easier to create web feeds in different information systems since web feeds enable
250   connections without direct system-to-system connections.
251
252   It can be noted, that different back-office systems (with a wide variety of different technologies) can
253   implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
254   kind solutions front-office systems dont need direct system-to-system communications with back-
255   office systems.
256
257
258   **Good luck!!!**
259
260   This opinion is quite limited. Hopefully there are other constructive ideas presented in other
261   opinions. This remains to be seen.
262
263   [Continues on the next page]
264

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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), 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

265
266   **ANNEX 1**
267
268   I have constructed different opinions about different issues, and on the following web page
269   are all written (PDF files) opinions:
270   http://www.jukkarannila.fi/lausunnot.html
271
272   **I have constructed specifically opinions related to information systems – both in English and**
273   **in Finnish.**
274
275   **Here is the list of opinions related to information systems.**
276
277   EN: Opinion 8: European Interoperability Framework, version 2, draft
278   http://www.jukkarannila.fi/lausunnot.html#nro_8
279
280   EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
281   proposal for comments
282   http://www.jukkarannila.fi/lausunnot.html#nro_9
283
284   EN:Opinion 13: Final Committee Draft ISO/IEC FCD3 19763-2
285   http://www.jukkarannila.fi/lausunnot.html#nro_13
286
287   EN: Opinion 14: SFS discussion paper / SFS:n keskusteluasiakirja
288   http://www.jukkarannila.fi/lausunnot.html#nro_14
289
290   EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
291   http://www.jukkarannila.fi/lausunnot.html#nro_17
292
293   EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
294   http://www.jukkarannila.fi/lausunnot.html#nro_18
295
296   EN: Opinion 19: Official Acknowledgement by the Commission
297   http://www.jukkarannila.fi/lausunnot.html#nro_19
298
299   EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
300   http://www.jukkarannila.fi/lausunnot.html#nro_20
301
302   EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
303   http://www.jukkarannila.fi/lausunnot.html#nro_21
304
305   EN: Opinion 23: Public consultation on the review of the European Standardisation System
306   http://www.jukkarannila.fi/lausunnot.html#nro_23
307
308   EN: Opinion 24: ISO/IEC JTC 1 / SC 34 / WGs 1, 4 and 5 in Helsinki 14-17 June 2010
309   http://www.jukkarannila.fi/lausunnot.html#nro_24

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Jukka S. Rannila

OPINION

10 (13)

www.jukkarannila.fi

24 June 2016

Public / WWW

310 FI: Lausunto 29: Avoimen demokratian avoimen datan avaamisen detaljit (ADADAD)
311 http://www.jukkarannila.fi/lausunnot.html#nro_29
312
313 EN: Opinion 30: Internet Filtering
314 http://www.jukkarannila.fi/lausunnot.html#nro_30
315
316 FI: Lausunto 31: Terveydenhuollon tietotekniikasta
317 http://www.jukkarannila.fi/lausunnot.html#nro_31
318
319 EN: Opinion 32: COMP/C-3/39.692/IBM - Maintenance services
320 http://www.jukkarannila.fi/lausunnot.html#nro_32
321
322 FI: Lausunto 33: Julkishallinnon tietoluovutusten periaatteet ja käytännöt
323 http://www.jukkarannila.fi/lausunnot.html#nro_33
324
325 EN: Opinion 34: REMIT Registration Format
326 http://www.jukkarannila.fi/lausunnot.html#nro_34
327
328 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
329 http://www.jukkarannila.fi/lausunnot.html#nro_37
330
331 FI: Lausunto 38: SADe-ohjelman avoimen lähdekoodin toimintamallin luonnos
332 http://www.jukkarannila.fi/lausunnot.html#nro_38
333
334 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
335 http://www.jukkarannila.fi/lausunnot.html#nro_39
336
337 EN: Opinion 41: AT.39398: observations on the proposed commitments
338 http://www.jukkarannila.fi/lausunnot.html#nro_41
339
340 EN: Opinion 43: Publication of extracts of the European register of market participants
341 http://www.jukkarannila.fi/lausunnot.html#nro_43
342
343 EN: Opinion 45: About ICT standardisation
344 http://www.jukkarannila.fi/lausunnot.html#nro_45
345
346 EN: Opinion 46: Review of the EU copyright rules
347 http://www.jukkarannila.fi/lausunnot.html#nro_46
348
349 EN: Opinion 47: Sharing or collaborating with government documents
350 http://www.jukkarannila.fi/lausunnot.html#nro_47
351
352 FI: Lausunto 49: JSH 166 -suosituksen päivitys
353 http://www.jukkarannila.fi/lausunnot.html#nro_49
354

355   EN: Opinion 52: Trusted Cloud Europe Survey
356   http://www.jukkarannila.fi/lausunnot.html#nro_52
357
358   EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
359   http://www.jukkarannila.fi/lausunnot.html#nro_53
360
361   EN: Opinion 54: Government Content Management System
362   http://www.jukkarannila.fi/lausunnot.html#nro_54
363
364   EN: Opinion 55: European Energy Regulation
365   http://www.jukkarannila.fi/lausunnot.html#nro_55
366
367   EN: Opinion 56: National Identity Proofing Guidelines
368   http://www.jukkarannila.fi/lausunnot.html#nro_56
369
370   FI: Lausunto 58: Puoluekokousaloitteet / 2010 ja 2014
371   http://www.jukkarannila.fi/lausunnot.html#nro_58
372
373   EN: Opinion 59: Green paper on mobile Health
374   http://www.jukkarannila.fi/lausunnot.html#nro_59
375
376   EN: Opinion 60: Cross-border inheritance tax problems within the EU
377   http://www.jukkarannila.fi/lausunnot.html#nro_60
378
379   EN: Opinion 61: European Register of Products Containing Nanomaterials
380   http://www.jukkarannila.fi/lausunnot.html#nro_61
381
382   FI: Lausunto 65: Lausuntopyyntö nettiäänestystyöryhmän väliraportista
383   http://www.jukkarannila.fi/lausunnot.html#nro_65
384
385   EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
386   http://www.jukkarannila.fi/lausunnot.html#nro_66
387
388   FI: Lausunto 67: Valtioneuvoston hanketiedon esiselvityksestä
389   http://www.jukkarannila.fi/lausunnot.html#nro_67
390
391   EN: Opinion 68: European Network Code Stakeholder Committees
392   http://www.jukkarannila.fi/lausunnot.html#nro_68
393
394   FI: Lausunto 69: Hallituksen esitys (luonnos 16.4.2015) vieraslajeista
395   http://www.jukkarannila.fi/lausunnot.html#nro_69
396
397   EN: Opinion 70: Providing better APIs in New Zealand
398   http://www.jukkarannila.fi/lausunnot.html#nro_70
399

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400   EN: Opinion 71: Common Schema for the Disclosure of Inside Information
401   http://www.jukkarannila.fi/lausunnot.html#nro_71
402
403   EN: Opinion 72: Queensland biofuel mandate
404   http://www.jukkarannila.fi/lausunnot.html#nro_72
405
406   EN: Opinion 73: Financial / Conceptual Frameworks
407   http://www.jukkarannila.fi/lausunnot.html#nro_73
408
409   EN: Opinion 74: Enabling the Internet of Things
410   http://www.jukkarannila.fi/lausunnot.html#nro_74
411
412   EN: Opinion 78: Consumer Complaints Register (NSW)
413   http://www.jukkarannila.fi/lausunnot.html#nro_78
414
415   EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015
416   http://www.jukkarannila.fi/lausunnot.html#nro_79
417
418   EN: Opinion 80: Mandatory Transparency Register
419   http://www.jukkarannila.fi/lausunnot.html#nro_80
420
421   EN: Opinion 81: Records and Information Management Standard
422   http://www.jukkarannila.fi/lausunnot.html#nro_81
423
424   EN: Opinion 84: Revision of the European Interoperability Framework
425   http://www.jukkarannila.fi/lausunnot.html#nro_84
426
427   EN: Opinion 85: Regulatory options for automated vehicles
428   http://www.jukkarannila.fi/lausunnot.html#nro_85
429
430   EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
431   http://www.jukkarannila.fi/lausunnot.html#nro_86
432
433   EN: Opinion 87: Assessing privacy and big data on the Internet
434   http://www.jukkarannila.fi/lausunnot.html#nro_87
435
436   EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
437   http://www.jukkarannila.fi/lausunnot.html#nro_88
438
439   EN: Opinion 89: BEREC Guidelines for net neutrality rules
440   http://www.jukkarannila.fi/lausunnot.html#nro_89
441
442   EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)
443   http://www.jukkarannila.fi/lausunnot.html#nro_90
444

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445
446   **ANNEX 2**
447 DISCLAIMERS
448
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455
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459 entity making law proposals.
460
461 These opinions are not meant to be extreme-right, moderate-right, extreme-centre [7], moderate-centre, extreme-left or
462 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of
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464 worldwide politics.
465
466 These opinions are not meant to rally for a candidacy in any public election in any level.
467
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477 This text is in English, but from a person, whose is not a native English-speaking person. Therefore the text may or may
478 not contain bad, odd and broken English, and can contain awkward linguistic solutions.
479
480 COPYRIGHT
481

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7   Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011
    parliamentary elections in Finland challenged the three-party system, since three "old" parties were not traditionally
    as the three largest parties. On 2015 this "new" party is part of the current Finnish Government. We all must be
    interested about this new development in Finland.

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