1 TO: CNECT-G1-HLG@ec.europa.eu
2 TO: CNECT-G1-REGULATORS@ec.europa.eu
3
4 Public consultation on the independent report from the High Level Group on Media Freedom and Pluralism
5 **and**
6 Public consultation on the independence of audiovisual regulatory bodies
7
8 European Commission
9 Directorate- General for Communications Networks, Content and Technology (CNECT)
10 Unit G1
11 Office BU25 05/181
12 B - 1049 Brussels
13
14 **Opinions about media freedom and pluralism, also about independence of audiovisual**
15 **regulatory bodies**
16
17 This Opinion is joint answer to the following consultations:
18
19   1)   Public consultation on the Independent Report from the HLG on Media Freedom and
20   Pluralism
21   2)   Public consultation on the independence of the audiovisual regulatory bodies
22
23 First of all, a lot of thanks to the Directorate- General for Communications Networks, Content and
24 Technology (CNECT) for organising this very important consultation.
25
26 This opinion represents an opinion of an individual citizen, not any legal entity.
27
28 This opinion does not contain:
29   –   any business secrets
30   –   any trade secrets
31   –   any confidential information.
32
33 This opinion is public.
34
35 The European Commission Directorate- General for Communications Networks, Content and
36 Technology (CNECT) can add the PDF file of this opinion to a relevant web page(s).
37
38 Annex 2 holds information about disclaimers and copyright.
39
40 Best Regards,
41
42 Jukka Rannila
43 citizen of Finland
44
45 signed electronically

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46 **The reference pages**
47
48 The mentioned reference pages (on 10 June 2013 those web pages were accessible) are following:
49
50   1)
51   Public consultation on the Independent Report from the HLG on Media Freedom and
52   Pluralism
53   http://ec.europa.eu/digital-agenda/en/public-consultation-independent-report-hlg-media-
54   freedom-and-pluralism
55
56   2)
57   Public consultation on the independence of the audiovisual regulatory bodies
58   http://ec.europa.eu/digital-agenda/en/public-consultation-independence-audiovisual-
59   regulatory-bodies
60
61 **Digitalisation of everything / Consequences**
62
63 This Opinion is mostly about the consequences of digitalisation (of everything), and about the direct
64 and indirect consequences for the "traditional" and "new" media.
65
66 **The (information) systems landscape**
67
68 It can be said, that the media (information) systems landscape is in constant flux because of
69 digitalisation (of everything). For the purposes of this Opinion, we make the following distinctions
70 for the information systems:
71   •   privately owned information systems (IS)
72   •   publicly owned information systems (IS).
73
74 More IDs and IDs is one of the consequences of digitalisation (of everything). The ID is identifier
75 in an information system. Examples of these identifiers are following:
76   1)   Facebook ID for individual person
77   2)   Facebook ID for individual up-dates of indivuals
78   3)   Data Universal Numbering System (D-U-N-S)
79   4)   Reuters Instrumens Codes (RICs)
80   5)   Social security number / ID for individual citizens in the European Union member
81   states
82   6)   Business Identity Code code for a company in the European Union member states
83   7)   A value added tax number for a company in the European Union member states.
84
85 In the European Union level there is two interesting examples of creating YET another ID for an
86 information system:
87   A) REMIT Registration Format
88   B) Registry options to facilitate linking of emissions trading systems
89
90 I answered to those consultions (A and B) and in the Annex 1 there are links to the answers /

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91 opinions of those consultations. In both cases there was need to register actions of private and/or
92 public activity of private and/or public communties.
93
94 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
95 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
96 of using IDs from privately owned information systems.
97
98 Social security numbers and tax identifier codes are examples of publicly owned information
99 system, and use of public IDs have spread to several private systems. E.g. in Finland the social
100 security ID is so prevalent, that the private companies can possibly combine information from
101 numerous private information systems. Naturally these combination effort raise serious questions
102 about the rules and regulations of combining information private information systems.
103
104 A tax identifier code and value added tax number for a company in the European Union member
105 states are also examples for widespread public ID. E.g. in Finland Finnish Business Information
106 System actually combined three previous register together, and the current Business Identity Code
107 have spread to the usage in several private and public systems.
108
109 **Why use so much text for a simple issue?**
110
111 The current reality is, that there will be more and more IDs, since digitalisation of different areas
112 will result new IDs and/or combination of new and old IDs.
113
114 Another aspect of these public IDs are, that they can demand very comprehensive amount of
115 international diplomacy. An example is the International Registry pursuant to the Luxembourg
116 Protocol to the Convention on International Interest in Mobile Equipment on Matters specific to
117 Railway Rolling Stock (the Luxembourg Protocol) [1]. The mentioned agreement has been signed by
118 the European Union, and the ratification process in underway.
119
120 The creation YET another public ID is not always organised by the European Union, and in some
121 cases the European Union (and member states) just have to accept the reality of some of those
122 public IDs – in some cases even private IDs are the norm. The Reuters Instrumens Codes (RICs) is
123 an example of a near monopoly situation, and some of current private IDs might constitute (near)
124 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
125 General, and it will be interesting to see possible new cases related to private IDs.
126
127 **A free and pluralistic media to sustain European democracy?**
128
129 The Report of the High Level Group on Media Freedom and Pluralism contains many interesting
130 recommendations (30), and in this Opinion will give will give a reasoned opinions just to some
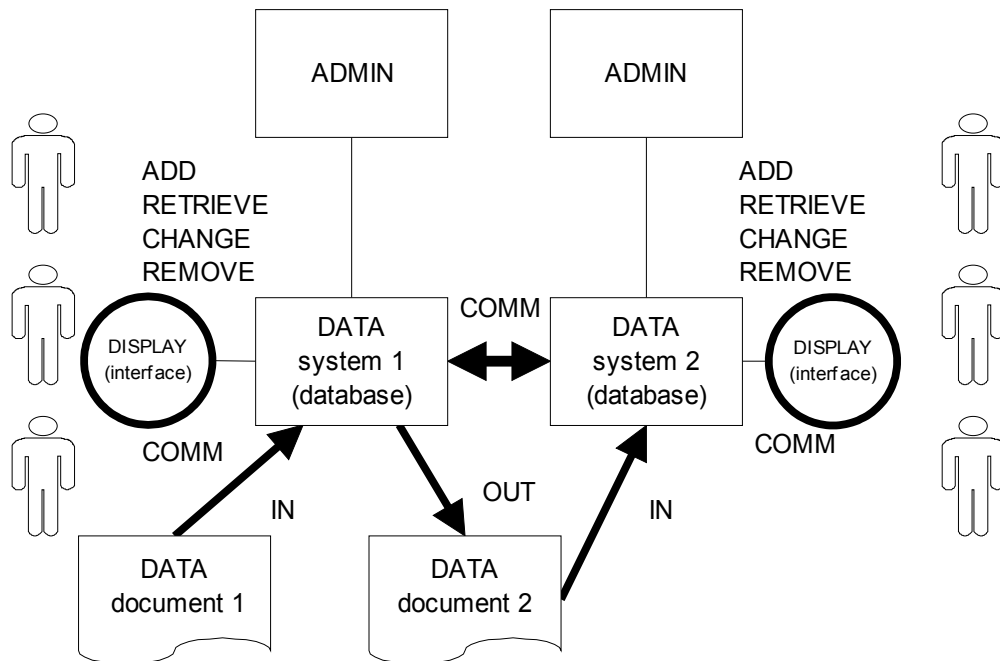131 questions / recommendations.
132
133

---

1   http://www.unidroit.org/english/conventions/mobile-equipment/main.htm (Convention on International Interests in
    Mobile Equipment (Cape Town, 2001)

134 **Documents → Databases → IDs → Combination of IDs → Information services**
135
136 In the following figure is a simplification of information technologies.
137

138
139
140 There some basic functions:
141   •   ADD data
142   •   RETRIVE data
143   •   CHANGE data
144   •   REMOVE data
145   •   ADMISTATION of a system.
146
147 These functions use/change/etc. data in two forms:
148   •   DOCUMENT
149   •   DATABASE.
150
151 Like the figure indicates, the documents can actually change to the database information in a
152 database; the results is naturally new IDs and new databases.
153
154 The data is consumed/used/etc. by the humans, and their internal mental world can change the
155 consumed/used/etc. information. This means, that for some persons the data transmitted with the
156 help of database IDs means something or nothing.
157
158 Humans use different displays and computer use different interfaces, e.g. a mobile device can
159 access data in an database with an interface, and then the data is converted to the mobile device
160 display.

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161
162 **The general aim: pursuit for the truth / truth-seeking**
163
164 The consultations (about the media freedom and bluralism and about independence of audiovisual
165 regulatory bodies) are interesting examples for protecting the truth-seeking endeavours. The truth is,
166 that misinformation can spread nowadays instantly around the Internet. Therefore, the truth-seeking
167 endeavours are facing yet another problem, i.e. distortion by the general misinformation.
168
169 There are some interesting examples of truth-seeking endeavours organised outside the European
170 Union:
171   * PolitiFact [2]
172   * PolitiFact Australia [3]
173   * FactCheck.org [4]
174   * The Fact Checker [5].
175
176 It can be said, that PolitiFact has a reputational brand, and the brand is now expanded to Australia.
177 All these four examples are organised differently. (e.g. a foundation, a private company). Also, there
178 a some (non-profit) institutions supporting investigative journalism. Naturally, there are different
179 site for leaking different classified material to the public, e.g.
180
181   * Wikileaks [6]
182   * Leak Directory [7].
183
184 The aim is the same with different organising modes: serious truth-seeking.
185
186 In this Opinion, I will not give a qualitative analysis for the examples; the general note is, that some
187 of those services can be very controversial depending on the situation.
188
189 **What is the problem then?**
190
191 In the following figure is a general conception of combination of real-time information systems and
192 more slow information systems. Generally speaking, a simple addition for a information system can
193 be result a real-time avalanche of updates to large amount of information systems.
194
195 There is the real-time problem for truth-seeking organisations/endeavours with real-time
196 challenge(s). Who will prevail: the truth-seeking organisations/endeavours or misininformation
197 distributors?
198
199

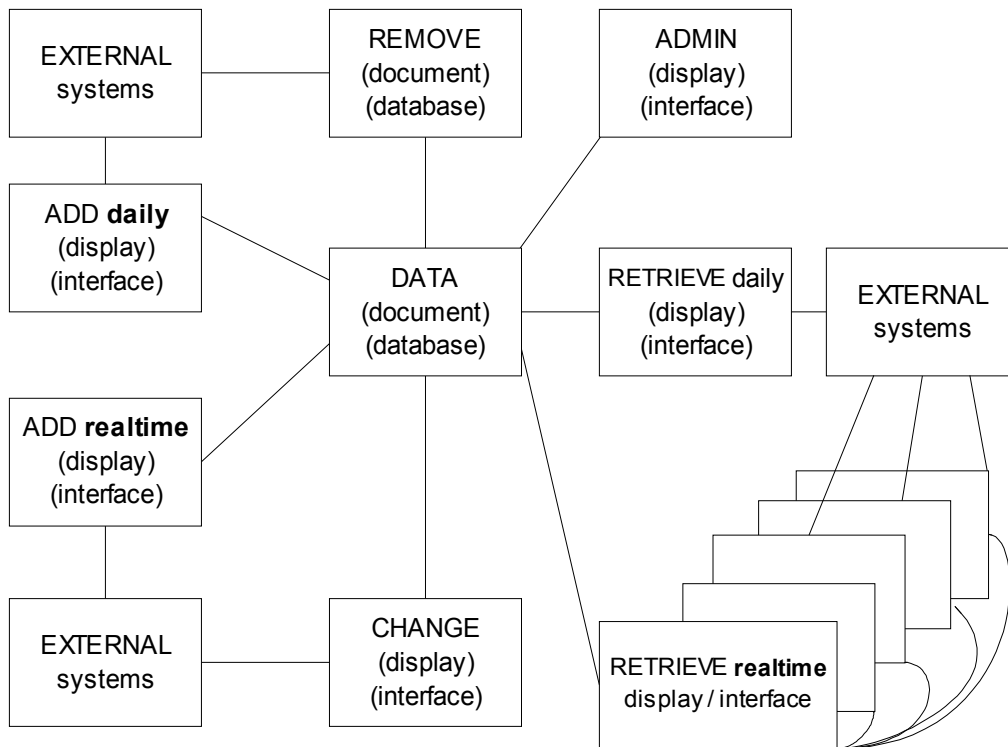2   http://www.politifact.com/about/, About PolitiFact
3   http://www.politifact.com.au/, PolitiFact Australia
4   http://www.factcheck.org/, FachCheck.org
5   http://www.washingtonpost.com/blogs/fact-checker, The Fact Checker / Washington Post
6   http://wikileaks.org/About.html, About WikiLeaks
7   http://leakdirectory.wikispaces.com/, directory of leak sites

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200

201 The next figure is a simple conception of a journalistic publication: from an idea to another idea. In
202 the middle there is the publication of a story. The problem nowadays is the follow-up of a story, and
203 the possibility for the misinformation in several stages. Also, the correction process for a story
204 might be flawed, since the misinformation distribution is always a challenge.

205

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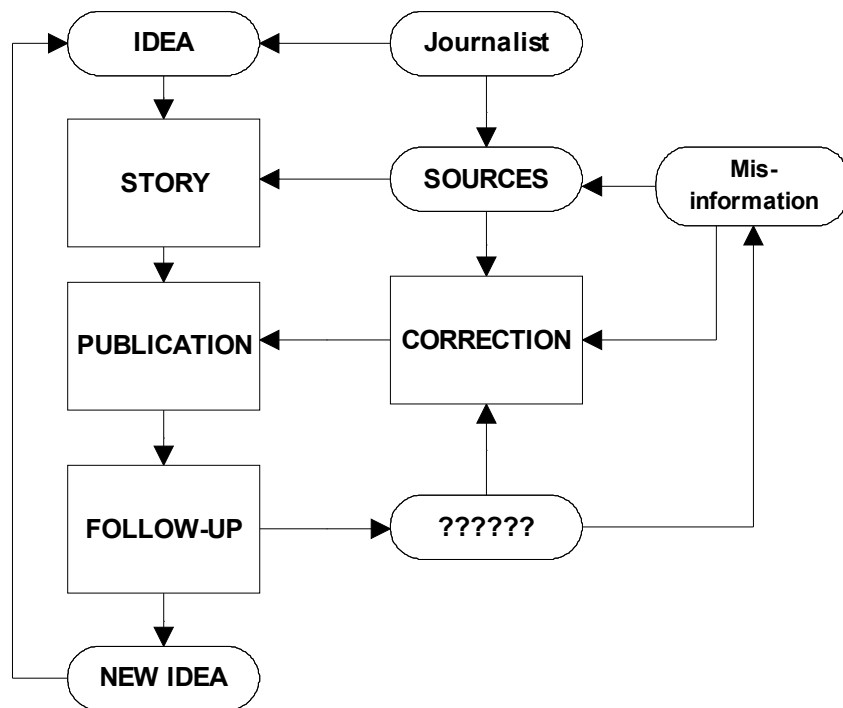
206 The challenge can be described in an another way. A story can have following stakeholders:
207 •   a story is made and owned by some actors
208 •   a story can have information about several actors, i.e. members of a story
209 •   a story is distibuted with an agreement, e.g. a newspaper is an agreed form of
210   distribution of a story.
211

```
                              ACTIONS


        AGREEMENT            STORY             OWNER


                              MEMBER
```
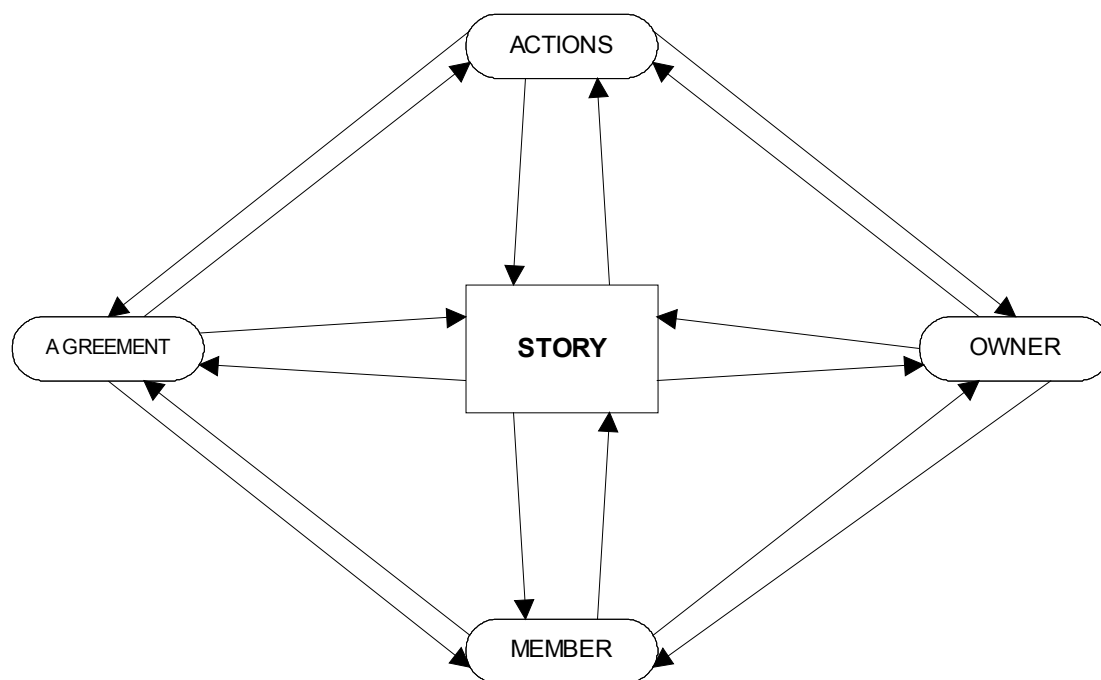
212
213
214 Who has the responsibility to for making corrections and mitigating previous and following
215 misinformation (related to a story)? In practical reality, there is a numerous amount of actions for a
216 simple story between different stakeholders. Like said before, everything can be almost/mostly
217 digital, and therefore almost/totally real-time.
218
219 **Voluntary and non-voluntary actions ?**
220
221 In the consultation documents there are numerous proposals for:
222
223 •   European Union (Commission in specific)
224 •   (national) competition authorities
225 •   (national) media councils
226 •   journalists
227 •   different media organisations
228 •   educators.
229
230 All these recommendations seems to be well-intended and some are even applaudable. The
231 conclusions from previous explanation is, that is a single story has a large amount of stakeholders,

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232 who need highly-detailed information of a specific story.
233
234 **National level?**
235
236 It can be concluded, that a specific story in the national in a member state is actually distributed in
237 several systems in a member state. Different member state systems (MSS) are then integrated in
238 different layers. In other words, the original is distributed totally and partially to several systems.
239
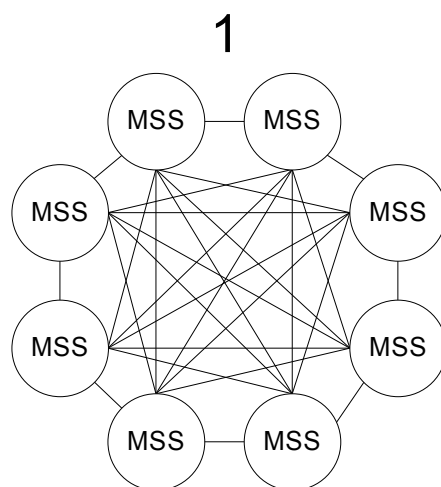
240
241
242 Like said before, one (or more) of the systems can be a special system for correcting the
243 misinformation distributed in different stories.
244
245 In the national level (member state) there is is a need at least for the following information:
246
247   •   clear identifier for an original story
248   •   original story without modifications
249   •   modification(s) added later to the original story
250   •   originator(s) of a story
251   •   factual references of a story
252   •   original distributor of a story
253   •   members (persons / communities) in a story
254   •   references to previous story / stories
255
256 On the other hand, the misinformation can spread also, and there could be the following
257 information:
258
259   •   clear identifier for the found misinformation
260   •   original (misinformation) story without modifications
261   •   modification(s) added later to the original (misinformation) story
262   •   originator(s) of a (misinformation) story

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263   •   factual references of a (misinformation) story
264   •   non-factual references of a (misinformation) story
265   •   original distributor of a (misinformation) story
266   •   members (persons / communities) in a (misinformation)story.
267
268 Naturally, there has to be identifier for person / community, who / which has made a evaluation of a
269 story and the amount of misinformation in a story. Therefore some more additions:
270
271   •   person / community responsible for evaluating the amount of misinformation
272   in a story.
273
274 It can be said, that depending on the situation in a specific member state, misinformation
275 distributing efforts are covered rather fast. E.g. in Finland different media actors are quite eager to
276 point mistakes in stories provided by other media actors.
277
278 **Need for another group of different IDs in the national level?**
279
280 Unfortunately, the proposals made before mean yet another problem with different IDs. Do we need
281 following IDs:
282
283   •   national IDs for different communities?
284   •   national IDs for different persons?
285   •   national IDs for different factual stories?
286   •   national IDs for different non-factual stories?
287
288 In the case of Finland, some of the base registers [8] [9] can be used very widely for pinpointing a
289 specific community. On the other hand, using social security numbers for pinpointing a specific
290 person would constitute several problems. The problem would be also following:
291
292   •   different national media organisations have different IDs for stories
293   •   different national media organisations have different IDs for communities
294   •   different national media organisations have different IDs for persons.
295
296 Naturally, this situation leads us to the "Clearing House" solutions, where different IDs are
297 compared, evaluated, cross-referenced, etc. The "Clearing House" then gives its own ID for general
298 consumption. The following figure gives an idea of the "Clearing House" solution, which means
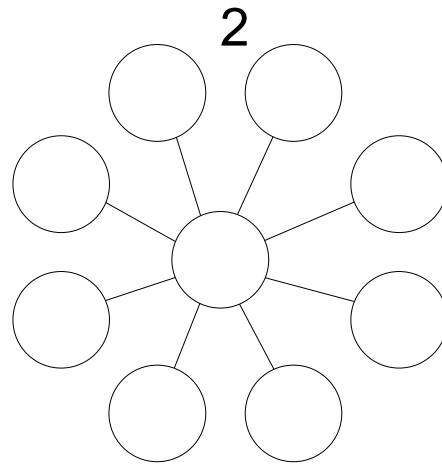299 one-to-many relations.
300
301 [Continues on the next page]
302

---

8   http://www.prh.fi/en.html, National Board of Patents and Registration of Finland
9   http://www.ytj.fi/english/, Joint business information system of the National Board of Patents and Registration and
     the Tax Administration

2

303
304
305 The practical reality is, that different "Clearing House" solutions can be combined, and therefore
306 the original IDs are hided.
307

1-2
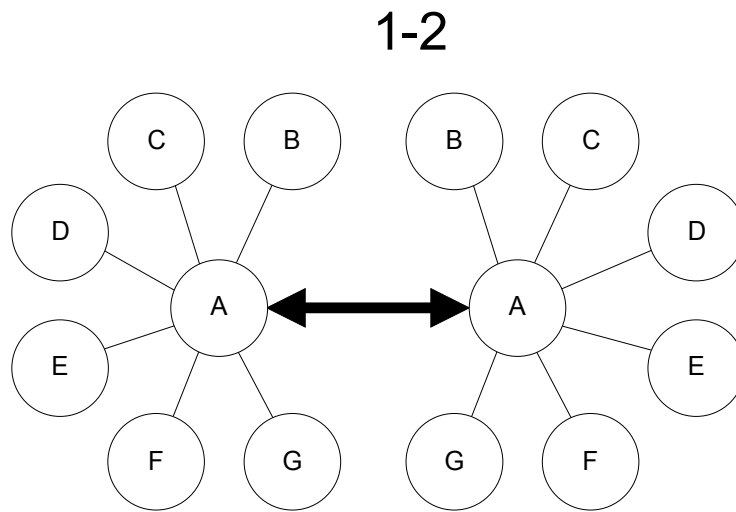
308
309
310 **EU-wide level?**
311
312 However, the news cycle (factual and non-factual) does not follow neatly or easily the national
313 borders between member states. A story revealed is global by nature in our globalised world.
314
315 This leads to the question of a European Contact Point (EUCP) for different member state systems
316 (MSS); also it can be said being a "Clearing House".
317
318 [Continues on the next page]
319

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2
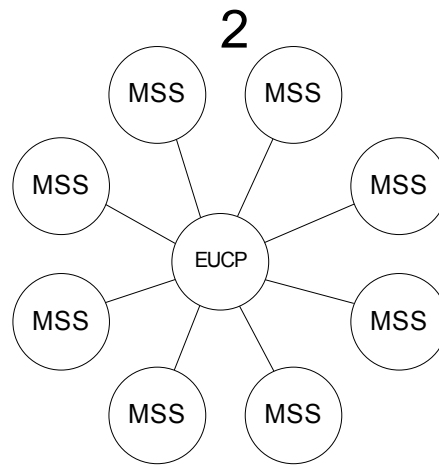
320
321
322   In the current situation, European Union member states (and some co-operation states) have their
323   own internal IDs for several information systems. Also, the members states organised as a
324   federation have their own internal problems with state-level IDs.
325
326   On the other hand, there are some working examples of joined or federated EU-wide registers.
327   However, the amount of administration and needed legally binding agreemens is considerable.
328

## 3
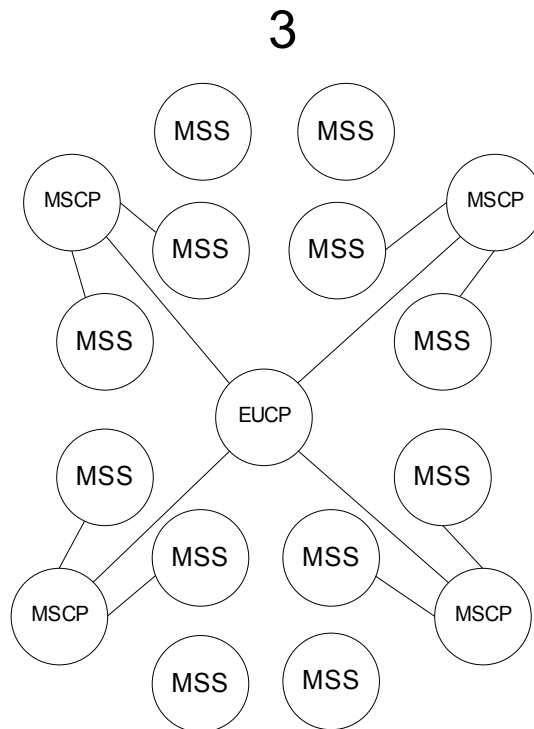
329
330
331   The solution can be, that member states have own Member State Contact Points (MSCP) and

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332 differet state level systems are combined gradually. Then the member state system IDs can be used
333 in the European Contact Point (EUCP).
334
335 **Global level?**
336
337 The new buzzword is "Cloud Computing". Following figure is one conception of a cloud system.
338
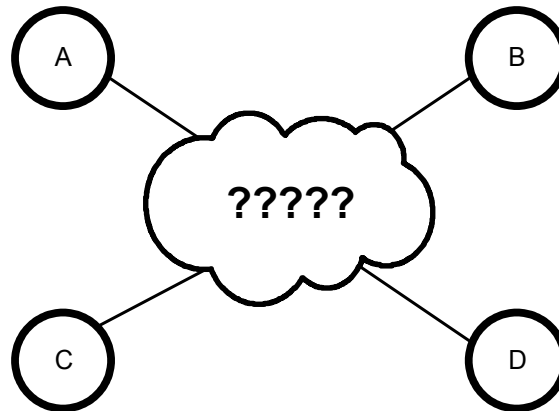
339
340
341 In theory, a cloud can be an application, and the users just add data to the application, and there is
342 no need to have local computing resources – e.g. "just have an internet conncetion". In this Opinion,
343 the serious risks in "cloud" computing are not assessed.
344
345 In practical reality, EU-wide systems (e.g. A, B, C, D) can be joined together with one-to-one
346 connections, and member state systems can be joided with one-to-many system (E.g. 27 systems →
347 System A, etc.). Then these EU-wide systems (e.g. A, B, C, D) use "the cloud" with non-EU
348 systems, which are relevant. In some cases, the global IDs are free to use. In some cases, there is
349 fees for these global IDs.
350
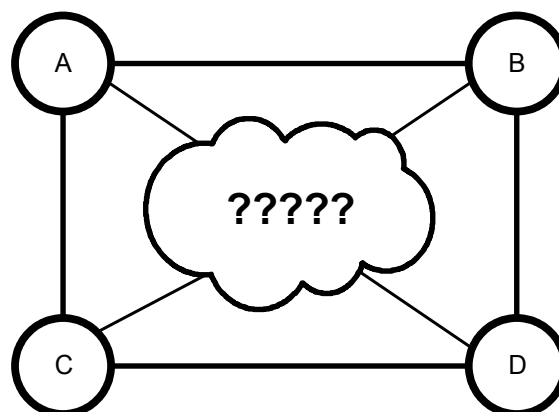
351
352
353 An example [10] of different non-EU IDs is C-SPAN video library, where there is IDs for persons,

---

10 http://www.c-spanvideo.org/, C-SPAN video library

354 events, orgnisations, etc. On the other hand, e.g. European Commission has very vast amount of
355 material, which have different IDs, and those services are usable with different information
356 technologies. Similarly, several other EU institutions provide material with different IDs, and their
357 usage is free world-wide.
358
359 **What should be done by the European Commission?**
360
361 What can be said about:
362
363   1)   media freedom and pluralism
364   2)   independence of audiovisual regulatory bodies.
365
366 It can be said, that the European Union must protect media freedom and pluralism. Also,
367 independence of audiovisual regulatory bodies must be protected by the European Union.
368
369 The main issues addressed in this Opinion are:
370
371   1)   The challenge of real-time misinformation
372   2)   Mitigating the real-time misinformation with different IDs for (inter alia)
373   stories, actor, factual informat, misinformation
374   3)   The problem of layered IDs nationally, EU-wide and globally
375   4)   Some solutions for layered IDs.
376
377 It can be said, that there will be several formats / standards, which can be e.g. 1) free and public, 2)
378 private and commercial, 3) not standardised, 4) standardised, 5) national, 6) international, 7)
379 official, 8) non-official, 9) obsolete. And naturally there are several combinations (1 to 9).
380
381 Therefore, the work of the European Commission is following:
382
383   1)   Follow the standards / formats landscape in the media landscape
384   2)   Encourage usage of public and free standards in the media landscape
385   3)   Possible fund and advise the development of public and free standards in the
386   media landscape
387   4)   Assess the situation with private and commercial IDs in the media landscape
388   5)   Possibly enforce some opening the usage of interfaces private and
389   commercial IDs in the media landscape (cf. RICs case)
390   6)   Active co-operation with global partners, who provide different IDs in the
391   media landscape
392
393 **1) First example of possible activity for the European Commission**
394
395 I have urged earlier the European Commission (different Dgs) to increase usage of [11] [12] RSS feeds.
396

---

11 http://en.wikipedia.org/wiki/RSS, RSS, Wikipedia article
12 http://www.rssboard.org/rss-specification, RSS 2.0 Specification

397
398
399 One way of supporting media freedom and pluralism is the usage of RSS feeds from several
400 informations services. European Commission could work with different stakeholders for converting
401 their own internal feeds to public RSS feeds.
402
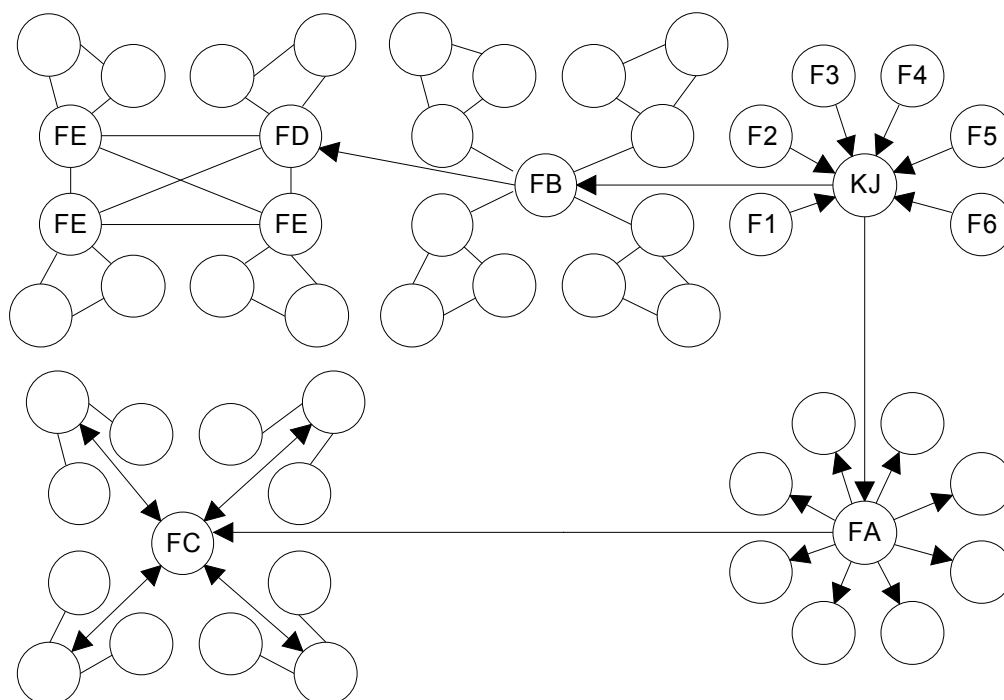
403
404
405 Generally speking, there are numerous non-RSS feeds provided by different information systems.
406 The European Commission could assess the situation, and it could fund the conversion work for
407 some information systems.
408
409 Like indicated in the previous figure, different informations systems are tightly integrated, and the
410 feeds (e.g. formats F1-F6, FA, FB, FC, FC, FD) between systems can be non-standard, i.e. non-
411 RSS.
412
413 **2) Second example of possible activity for the European Commission**
414
415 Previously, there was is a simple conception of a journalistic publication: from an idea to another
416 idea, and in the middle there is the publication of a story. In the following figure, there is simple
417 process model from beginnig to ending.
418
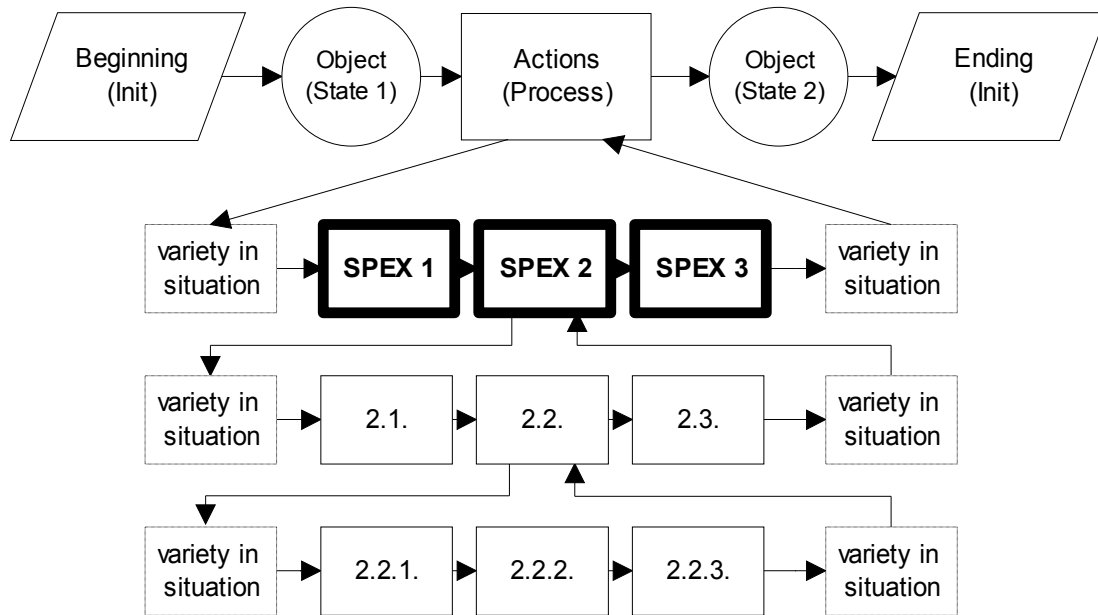
419
420
421 Generally speaking, informations system need in some points highly detailed information, and in
422 some cases this information is given by people using displays.
423
424 The European Commission could work with global and regional partners for creating standardised
425 user interfaces (SPEX) for different stakeholders. These standardised user interfaces (SPEX) could
426 then be implemented by different information systems.
427
428 An example for this kind of standardised user interfaces (SPEX) could be "a citizen interface" for
429 reporting inaccuracies in a published story, i.e. the "a citizen interface" for reporting inaccuracies in
430 story would be the same or almost the same in different systems regardless of the technological
431 measures. These standardised user interfaces (SPEX) could be developed in different contest and/or
432 consultations.
433
434 **3) Third example of possible activity for the European Commission**
435
436 Since the European Union is a multi-lingual community, the question of language is important.
437
438 The European Commission could work with global and regional partners for publishing linguistic
439 versions of some important texts in different information systems. Generally speaking, just English
440 versions of texts in some information systems might not be feasible. The developers some
441 information systems could be very interested to have linguistic versions for their information
442 services, but they dont have resources to do that.
443
444 One option is, that the European Commission funds the translation work of some important
445 information systems, and then collects the funded amount of money is collected gradually back, e.g.
446 yearly basis. Naturally, there has to be serious assessment of this approach, but in some cases an

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447 important information systems can be developed with minimal resources, even though the usage of
448 that system can be global.
449
450 **4) Fourth example of possible activity for the European Commission**
451
452 The previously mentioned need for standardised formats and standardised user interfaces is just one
453 part of the interopebility in different information systems. There are several other viewpoints with
454 interoperability and with interoperability layers.
455
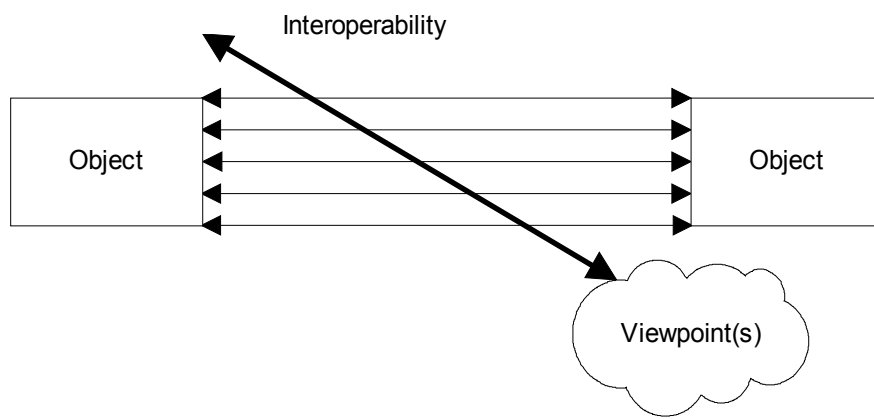
456
457
458 The consultations most likely will result several ideas and/or idea for securing media freedom and
459 pluralism. The commission could publish a work program based on the results of these two
460 consultations. The publish work program should be divided to some layers:
461
462   1)   Technological layer
463   2)   Data layer
464   3)   Information layer
465   4)   People layer
466
467 The easiest layer is naturally the technological layer, and the standardisation in that area can be very
468 fast. In the data layer there can be competing ideas for different IDs, can those proposals should be
469 assessed with different stakeholders. The information layer is about understanding the received data
470 - hopefully in the correct / original form. The European Commission can (once more) provide
471 auspices for multi-lingual understanding. The people layer is the hardest layer, since we are very
472 accustomed to certain models.
473
474 **Good luck !!!!!!!**
475
476 This Opinion is quite limited, and probably other opinions will result some constructive ideas.
477
478 Jukka Rannila
479 citizen of Finland

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480
481   **ANNEX 1**
482
483   My opinions to the previous and relevant consultations – there consultations were mostly organised
484   by the Commission of the Europan Union.
485
486   General page to all consultations – both in English and in Finnish:
487   http://www.jukkarannila.fi/lausunnot.html
488
489
490   EN: Opinion 1: Review of the rules on access to documents
491   http://www.jukkarannila.fi/lausunnot.html#nro_1
492
493   EN: Opinion 2: Schools for the 21st Century
494   http://www.jukkarannila.fi/lausunnot.html#nro_2
495
496   EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
497   Safe and Innovative medicines
498   http://www.jukkarannila.fi/lausunnot.html#nro_3
499
500   EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
501   http://www.jukkarannila.fi/lausunnot.html#nro_5
502
503   EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
504   http://www.jukkarannila.fi/lausunnot.html#nro_6
505
506   EN: Opinion 8: European Interoperability Framework, version 2, draft
507   http://www.jukkarannila.fi/lausunnot.html#nro_8
508
509   EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
510   proposal for comments
511   http://www.jukkarannila.fi/lausunnot.html#nro_9
512
513   EN: Opinion 15: Collective Redress
514   http://www.jukkarannila.fi/lausunnot.html#nro_15
515
516   EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
517   http://www.jukkarannila.fi/lausunnot.html#nro_17
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519   EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
520   http://www.jukkarannila.fi/lausunnot.html#nro_18
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522   EN: Opinion 19: Official Acknowledgement by the Commission
523   http://www.jukkarannila.fi/lausunnot.html#nro_19
524

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525
526   EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
527   http://www.jukkarannila.fi/lausunnot.html#nro_20
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529   EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
530   http://www.jukkarannila.fi/lausunnot.html#nro_21
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532   EN: Opinion 23: Public consultation on the review of the European Standardisation System
533   http://www.jukkarannila.fi/lausunnot.html#nro_23
534
535   EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
536   http://www.jukkarannila.fi/lausunnot.html#nro_27
537
538   EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
539   http://www.jukkarannila.fi/lausunnot.html#nro_28
540
541   EN: Opinion 30: Internet Filtering
542   http://www.jukkarannila.fi/lausunnot.html#nro_30
543   NOTE: Organised by the European Committee for Standardization (CEN) [13]
544
545   EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
546   http://www.jukkarannila.fi/lausunnot.html#nro_32
547
548   EN: Opinion 34: REMIT Registration Format
549   http://www.jukkarannila.fi/lausunnot.html#nro_34
550   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [14]
551
552   EN: Opinion 35: Exploiting the employment potential of the personal and household services
553   http://www.jukkarannila.fi/lausunnot.html#nro_35
554
555   EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
556   http://www.jukkarannila.fi/lausunnot.html#nro_37
557
558   EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
559   http://www.jukkarannila.fi/lausunnot.html#nro_39
560

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13 http://www.cen.eu/ (Accessed 2 July 2012)
14 http://www.acer.europa.eu/ (Accessed 2 July 2012)

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603

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15 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.