1
2   **TO: European Commission**
3
4   **TO: UNIT H3 / Directorate-General for Communications Networks, Content and Technology**
5   **(DG CNECT)**
6   **TO: UNIT B3 / Directorate-General for Health and Food Safety (DG SANTE)**
7
8
9   First of all, a lot of thanks to European Commission 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 previous consultations on the European Union level.
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   **A list of previous consultations**
40
41   On Annex 1 is information about my previous consultations based on different consultations. Many
42   opinions have be been addressed to different units of the European Commission. I have repeated the
43   same issues several times on those documents (Opinions).
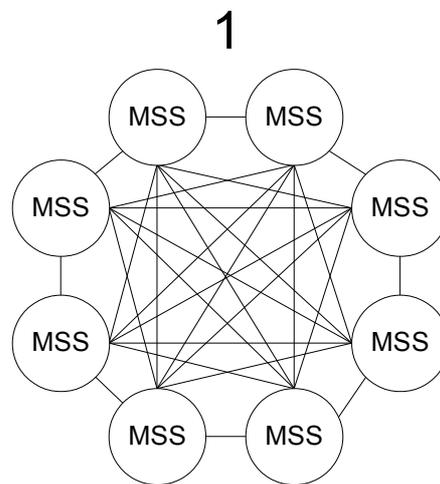44
45   **About links between different information systems**
46
47   Different member states (European Union) have unique situations with information systems. Next
48   figure tries to describe this situation with member state systems (MSS).
49

50
51   **MSS = Member State System**
52
53   Based on unique situations there can be several complicated system-to-system connections in
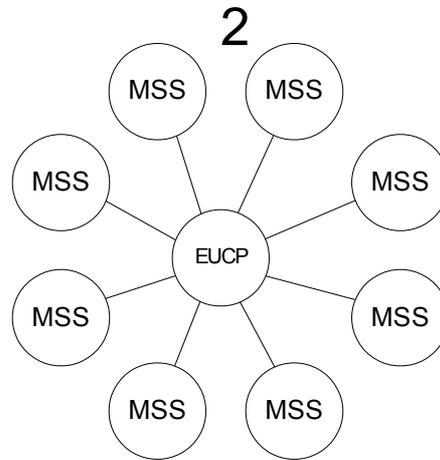54   different member states.
55
56   One option could be linking different member state systems to one European Union Contact Point.
57
58
59
60   [Continues on the next page]

2

61
62   **MSS = Member State System, EUCP = European Union Contact Point**
63
64   This option (MSS ↔ EUCP) could mean very large number of different member state system.
65   Based on 28 member state systems there could be hundreds of connections:
66
67   28 x 10 = 280 MSS ↔ 1 EUCP
68   28 x 20 = 560 MSS ↔ 1 EUCP
69   28 x 30 = 840 MSS ↔ 1 EUCP
70   etc.
71
72   Here we can note that there can be hierarchy between different system (EU ↔ member states) and
73   there can be member state contact points (MCP). Then there can be some hierarchy between
74   different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
75   with member state systems in member states. Therefore member state contact points (MCP) can
76   reduce the complexity with European Union contact point (EUCP)
77
78   Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
79   that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
80
81
82   [Continues on the next page]

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3
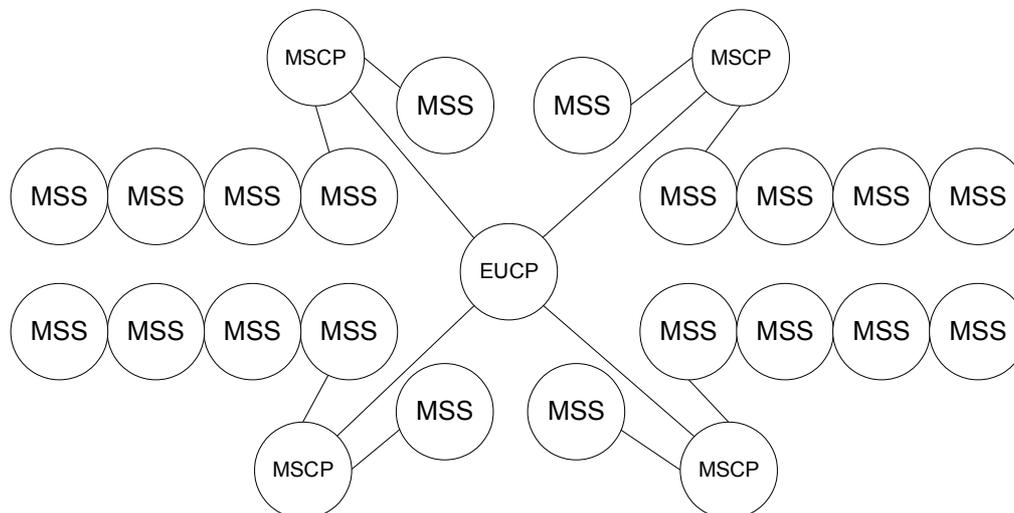
MSS = Member State System, EUCP = European Union Contact Point
MSCP = Member State Contact Point

Proposal: There could be some serious work for developing a standardised member state contact point (MSCP).

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

Proposal: European Union contact point (EUCP) and member state contact points (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European Union level.

Naturally we have to note that developing a standardised member state contact point (MSCP) means more work. On the other hand a standardised member state contact point (MSCP) could handle cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member states may have more systems than other member stated. We have to note that there are different systems based on several technological solutions.
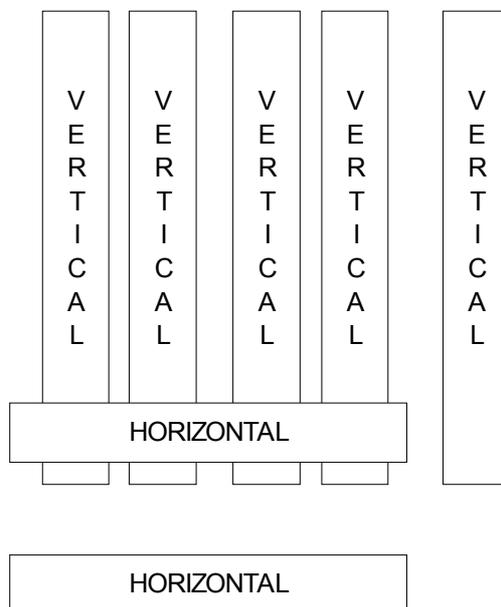
About different standards to be used when developing standardised member state contacts points (MSCP)

Developing a _**standardised**_ member state contact point (MSCP) means some work to be done.

I have proposed several times to use _**open horizontal standards**_ when developing different information system.

Favouring open standards / Favouring horizontal standards

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112

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│ V │ │ V │ │ V │ │ V │     │ V │
│ E │ │ E │ │ E │ │ E │     │ E │
│ R │ │ R │ │ R │ │ R │     │ R │
│ T │ │ T │ │ T │ │ T │     │ T │
│ I │ │ I │ │ I │ │ I │     │ I │
│ C │ │ C │ │ C │ │ C │     │ C │
│ A │ │ A │ │ A │ │ A │     │ A │
│ L │ │ L │ │ L │ │ L │     │ L │
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        ┌─────────────────────┐
        │      HORIZONTAL      │
        └─────────────────────┘
```

113
114
115 There are differences between horizontal and vertical standards. A simple example is naturally
116 email solutions. There are several vertical standards when creating technically email solutions. Then
117 there are horizontal standards which enable sending messages between technically different email
118 solutions.
119
120   **Proposal: There could be assessment of vertical and horizontal standards.**
121
122   **Proposal: Using horizontal standards could be favoured when creating different**
123   **information systems on the European Union level.**
124
125 Horizontal standards enables technological solutions which can work together. Horizontal standards
126 hides different complexities in information systems.
127
128   **Opinion: The number of redundant standardisation efforts should be minimal.**
129
130   **Proposal: There could be separation of horizontal standards and vertical standards.**
131
132   **Proposal: There could be different standardisation efforts to horizontal standards and**
133   **vertical standards.**
134
135 Personally I have advocated using different horizontal standards. For example email standards
136 (horizontal) are implemented with very different technologies (vertical).
137
138 Here we can note some problems:
139

140 •   some systems are based on **de-facto** standards
141 •   some systems are based on **de-jure** standards
142 •   there can be confrontations between **de-facto** and **de-jure** standards
143 •   there can be a monopoly situation in some domain
144 •   some standards may inhibit possible actions of some stakeholders
145 •   there can be a standard war on some domains
146 •   standards have different life-cycles
147 •   systems have different life-cycles
148 •   there can be mismatches between different life-cycles
149 •   there can be failed standards
150 •   there can be deprecated standards.
151
152 It is quite normal situation in the information technology field that there are competing standards
153 for some application field. Therefore there are all the time ongoing "standards wars" or "format
154 wars". The information technology standards tend to be interrelated and one "standards war" or
155 "format war" can lead to another similar situation.
156
157 I have advocated open standards even though in some cases open standards are not de facto
158 standards. In practice public sector has very important role, when some standards are competing in
159 the market place. Because public sector has a considerable power when buying/developing
160 information systems and therefore public sector can sometimes direct markets to certain standards.
161 Therefore there should be serious vigilance when assessing different standards and "standards" in
162 some application fields.
163
164 **About different identifiers (ID)**
165
166 Developing a standardised member state contact point (MSCP) means some work to be done. Here
167 we can note that there will be several _**identifiers**_ when developing new systems and maintaining
168 current systems (EUCP ↔ MSCP).
169
170 I have proposed several times to use _**open and public identifiers**_ when developing different
171 information system.
172
173 **More and more new identifiers (ID)**
174
175 In previous consultations there has been discussion about different identifiers (ID) in different
176 information systems. It can be noted from the previous opinions that there will be several and
177 different identifiers (ID) for different levels.
178
179 Examples of these identifiers (ID) are following:
180
181   1) Facebook ID for an individual person
182   2) Facebook ID for the individual up-dates of individuals
183   3) Data Universal Numbering System (D-U-N-S)
184   4) Reuters instruments codes (RICs)

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185   5) Social security code for individual citizens in the European Union member states
186   6) Business identity code for a company in an European Union member state
187   7) Value added tax code for a company in an European Union member state.
188
189 The examples of private identifiers (Facebook IDs, Data Universal Numbering System (D-U-N-S),
190 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
191 of using identifiers (ID) from privately owned information systems.
192
193   **Proposal: There could be a systematic review of different identifiers (ID) on different**
194   **levels.**
195
196   **Proposal: Possible systematic review of different identifiers (ID) should assess different**
197   **situations.**
198
199 Different information systems have also internal identifiers (ID) and external identifiers (ID) for
200 (possible) public usage. The added value for different stakeholders is provided by combination of
201 different identifiers (ID) in a specific information system.
202
203   **Proposal: The could be some assessment(s) based on different versions of different**
204   **identifiers (ID).**
205
206 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
207 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
208 (ID), but this consolidation means some serious technical and administrative actions.
209
210   **Proposal: Legacy identifiers (ID) could be assessed seriously.**
211
212 When information about relevant identifiers is collected, there could be a serious assessment of
213 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
214 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.
215
216   **Proposal: The nature of different identifiers (ID) could be assessed.**
217
218   **Proposal: There could be serious negotiations with some providers of identifiers (ID).**
219
220 In the European Union there has been different anti-trust cases which are related to different private
221 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
222 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.
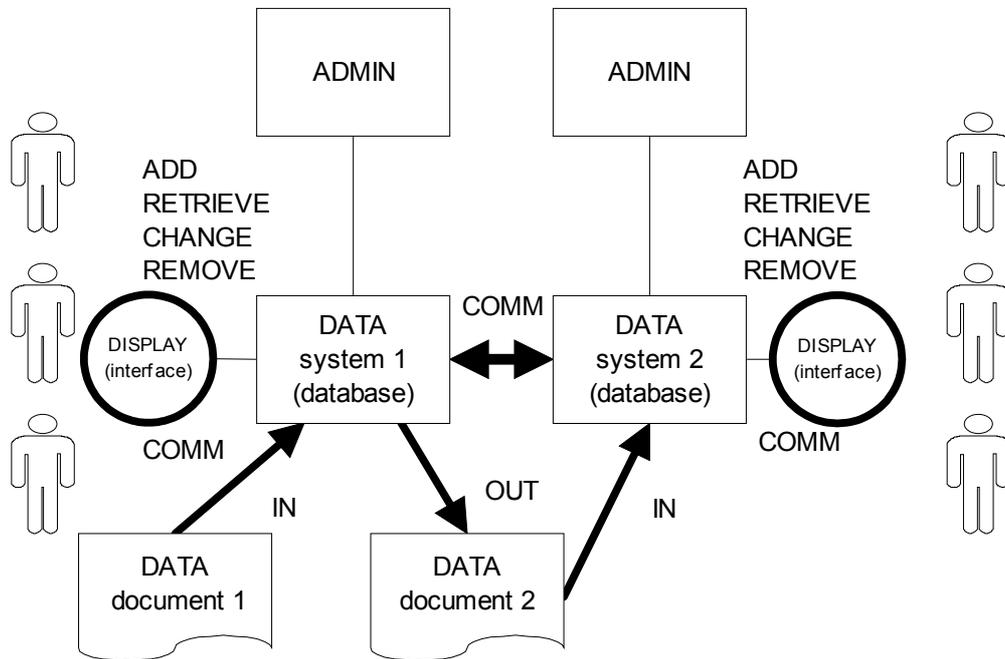223
224 **One conception for information systems**
225
226
227 [Continues on the next page]

228
229
230 Now we can add four basic functions, communication, displays, interfaces, users, documents, data
231 and databases for describing an information system.
232 Like the figure indicates, there are databases in different information systems. Then there are
233 different documents for transmitting data between different systems. Here we can note especially
234 following standardisation needs for different parts of different parts of an information system.
235
236 From this simple (figure) conception we can differentiate several standard classes.
237
238   1) Data (documents) standards
239   2) Data (database) standards
240   3) Standards for adding data to a system.
241   4) Standards for retrieving data from a system.
242   5) Standards for changing data in a system.
243   6) Standards for removing data from a system.
244   7) Display standards
245   8) Interface standards
246   9) Different communication standards.
247
248 **Some issues to be consider – public systems and private systems?**
249
250 Here we can note following combinations:
251   •   public ↔ public
252   •   private ↔ private
253   •   private ↔ public
254   •   (public ↔ private)

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255
256   Based on previous considerations there could be some efforts:
257
258   •   There could be some adjustments for (public ↔ public) public information systems.
259   •   There could be some adjustments for (private ↔ private) private information
260   systems.
261   •   There could be some adjustments for (private ↔ public) cooperation between public
262   and private information systems.
263
264   **There can be some examples:**
265
266   **a) There could be some regulations for providing interfaces (private, public)**
267   **b) There could be some regulations for document formats (private, public)**
268   **c) There could be some regulations for transmitting data between different systems**
269   **d) There could be some regulations for using databases (private, public)**
270   **e) There could be some regulations for using programs (private, public)**
271   **f) There could be some regulations for retrieving information from different systems.**
272
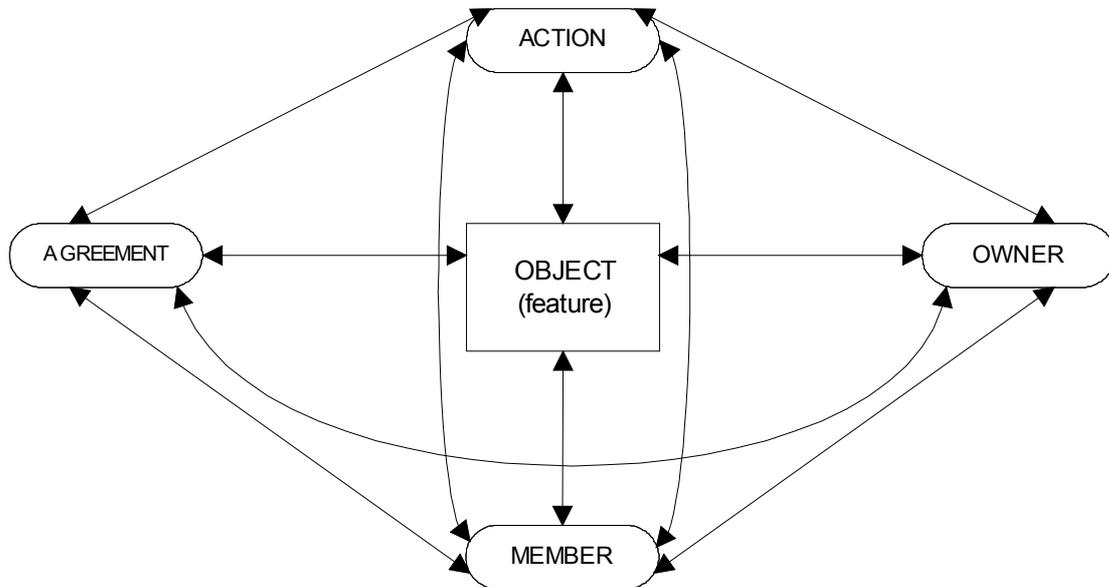
273
274
275   **Note: The relations between different aspects of information systems can result**
276   **rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**
277
278   Here we can note the difference between owners, agreements and members. In reality ownerships
279   agreements and memberships cause very complex networks, and those networks are changing all
280   the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
281   entities, life-cycles, etc.
282
283   Here we can note that ownership, agreement and membership are interlinked in different ways.

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284 Generally speaking average usage of a system means an unique combination of ownership,
285 agreement and membership. When everything works fine there are not problems. However changes
286 with ownership, agreement and membership can result difficult situations.
287

	Owner? Member? Agreement?	Standards?	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				

288
289 Naturally, there can be solutions, which are not based on the maximum solution. It can be
290 concluded, that this consultation is not (yet) about technical details.
291
292   **Note: The relations between different aspects of information systems can result**
293   **rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**
294
295   **Proposal: There could be some considerations for assessing possible / future changes in**
296   **ownerships, agreements and memberships.**
297
298 **Timelines for consolidating member state systems (MSS)**
299
300 Here we can note following issues:
301
302   •   lifetime for different systems
303   •   processes have lifetime (active processes)
304   •   processes are implemented with help of an information system
305   •   there are different states and events during a processes
306   •   there can different documents based on states and events
307

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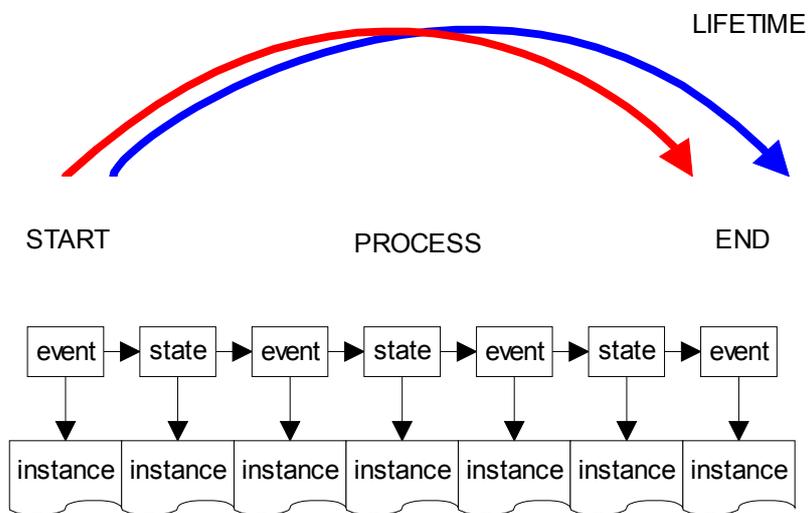
308
309
310   **Proposal: There could different timelines for consolidating different member state**
311   **systems (MSS).**
312
313   **Note: consolidating different member state systems (MSS) with member state**
314   **contact points (MSCP) means some work for years.**
315
316
317
318
319   **Good luck!!!**
320
321   This opinion is quite limited. Hopefully there are other constructive ideas presented in other
322   opinions. This remains to be seen.
323
324   [Continues on the next page]

325   **ANNEX 1**
326
327 My opinions to the previous and relevant consultations – there consultations were mostly organised
328 by the European Commission. General page to all consultations – both in English and in Finnish:
329 http://www.jukkarannila.fi/lausunnot.html
330
331
332 My opinions to the previous and relevant consultations – there consultations were mostly organised
333 by the European Commission.
334
335 EN: Opinion 1: Review of the rules on access to documents
336 http://www.jukkarannila.fi/lausunnot.html#nro_1
337
338 EN: Opinion 2: Schools for the 21st Century
339 http://www.jukkarannila.fi/lausunnot.html#nro_2
340
341 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
342 Safe and Innovative medicines
343 http://www.jukkarannila.fi/lausunnot.html#nro_3
344
345 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
346 http://www.jukkarannila.fi/lausunnot.html#nro_5
347
348 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
349 http://www.jukkarannila.fi/lausunnot.html#nro_6
350
351 EN: Opinion 8: European Interoperability Framework, version 2, draft
352 http://www.jukkarannila.fi/lausunnot.html#nro_8
353
354 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
355 proposal for comments
356 http://www.jukkarannila.fi/lausunnot.html#nro_9
357
358 EN: Opinion 15: Collective Redress
359 http://www.jukkarannila.fi/lausunnot.html#nro_15
360
361 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
362 http://www.jukkarannila.fi/lausunnot.html#nro_17
363
364 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
365 http://www.jukkarannila.fi/lausunnot.html#nro_18
366
367 EN: Opinion 19: Official Acknowledgement by the Commission
368 http://www.jukkarannila.fi/lausunnot.html#nro_19
369

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370 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
371 http://www.jukkarannila.fi/lausunnot.html#nro_20
372
373 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
374 http://www.jukkarannila.fi/lausunnot.html#nro_21
375
376 EN: Opinion 23: Public consultation on the review of the European Standardisation System
377 http://www.jukkarannila.fi/lausunnot.html#nro_23
378
379 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
380 http://www.jukkarannila.fi/lausunnot.html#nro_27
381
382 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
383 http://www.jukkarannila.fi/lausunnot.html#nro_28
384
385 EN: Opinion 30: Internet Filtering
386 http://www.jukkarannila.fi/lausunnot.html#nro_30
387 NOTE: Organised by the European Committee for Standardization (CEN) [1]
388
389 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
390 http://www.jukkarannila.fi/lausunnot.html#nro_32
391
392 EN: Opinion 34: REMIT Registration Format
393 http://www.jukkarannila.fi/lausunnot.html#nro_34
394 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [2]
395
396 EN: Opinion 35: Exploiting the employment potential of the personal and household services
397 http://www.jukkarannila.fi/lausunnot.html#nro_35
398
399 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
400 http://www.jukkarannila.fi/lausunnot.html#nro_37
401
402 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
403 http://www.jukkarannila.fi/lausunnot.html#nro_39
404
405 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
406 http://www.jukkarannila.fi/lausunnot.html#nro_40
407
408 EN: Opinion 41: AT.39398: observations on the proposed commitments
409 http://www.jukkarannila.fi/lausunnot.html#nro_41
410
411 EN: Opinion 42: Opening up Education
412 http://www.jukkarannila.fi/lausunnot.html#nro_42

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

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Jukka S. Rannila

www.jukkarannila.fi

OPINION

14 August 2017

14 (17)

Public / WWW

413
414 EN: Opinion 43: Publication of extracts of the European register of market participants
415 http://www.jukkarannila.fi/lausunnot.html#nro_43
416 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
417
418 EN: Opinion 44: Evaluation policy guidelines
419 http://www.jukkarannila.fi/lausunnot.html#nro_44
420
421 EN: Opinion 45: About ICT standardisation
422 http://www.jukkarannila.fi/lausunnot.html#nro_45
423
424 EN: Opinion 46: Review of the EU copyright rules
425 http://www.jukkarannila.fi/lausunnot.html#nro_46
426
427 EN: Opinion 51: European Area of Skills and Qualifications
428 http://www.jukkarannila.fi/lausunnot.html#nro_51
429
430 EN: Opinion 52: Trusted Cloud Europe Survey
431 http://www.jukkarannila.fi/lausunnot.html#nro_52
432
433 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
434 http://www.jukkarannila.fi/lausunnot.html#nro_53
435 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
436
437 EN: Opinion 55: European Energy Regulation
438 http://www.jukkarannila.fi/lausunnot.html#nro_55
439 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
440
441 EN: Opinion 59: Green paper on mobile Health
442 http://www.jukkarannila.fi/lausunnot.html#nro_59
443
444 EN: Opinion 60: Cross-border inheritance tax problems within the EU
445 http://www.jukkarannila.fi/lausunnot.html#nro_60
446
447 EN: Opinion 61: European Register of Products Containing Nanomaterials
448 http://www.jukkarannila.fi/lausunnot.html#nro_61
449
450 EN: Opinion 64: Corporate Social Responsibility - European Commission
451 http://www.jukkarannila.fi/lausunnot.html#nro_64
452
453 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
454 http://www.jukkarannila.fi/lausunnot.html#nro_66
455
456
457

458 EN: Opinion 68: European Network Code Stakeholder Committees
459 http://www.jukkarannila.fi/lausunnot.html#nro_68
460 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
461
462 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
463 http://www.jukkarannila.fi/lausunnot.html#nro_71
464 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
465
466 EN: Opinion 74: Enabling the Internet of Things
467 http://www.jukkarannila.fi/lausunnot.html#nro_74
468 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) [3]
469
470 EN: Opinion 80: Mandatory Transparency Register
471 http://www.jukkarannila.fi/lausunnot.html#nro_80
472
473 EN: Opinion 84: Revision of the European Interoperability Framework
474 http://www.jukkarannila.fi/lausunnot.html#nro_84
475
476 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
477 http://www.jukkarannila.fi/lausunnot.html#nro_86
478
479 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
480 http://www.jukkarannila.fi/lausunnot.html#nro_88
481
482 EN: Opinion 89: BEREC Guidelines for net neutrality rules
483 http://www.jukkarannila.fi/lausunnot.html#nro_89
484 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
485
486 EN: Opinion 93: Safety of apps and other non-embedded software
487 http://www.jukkarannila.fi/lausunnot.html#nro_93
488
489 EN: Opinion 95: Targeted consultation on eForms
490 http://www.jukkarannila.fi/lausunnot.html#nro_95
491
492 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
493 http://www.jukkarannila.fi/lausunnot.html#nro_97
494
495 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
496 http://www.jukkarannila.fi/lausunnot.html#nro_98
497
498 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
499 Regulators. Recast
500 http://www.jukkarannila.fi/lausunnot.html#nro_99
501

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

502
503   EN: Opinion 100: Protection of personal data (EU)
504   http://www.jukkarannila.fi/lausunnot.html#nro_100
505
506   EN: Opinion 101: Governance of the Energy Union
507   http://www.jukkarannila.fi/lausunnot.html#nro_101
508
509   EN: Opinion 102: Smart Wearables
510   http://www.jukkarannila.fi/lausunnot.html#nro_102
511
512   EN: Opinion 106: Review of the European Union Agency for Network and Information Security
513   (ENISA)
514   http://www.jukkarannila.fi/lausunnot.html#nro_106
515
516   EN: Opinion 108: Single Digital Gateway
517   http://www.jukkarannila.fi/lausunnot.html#nro_108
518
519
520
521
522   My opinions to the previous and relevant consultations – there consultations were mostly organised
523   by the European Commission. General page to all consultations – both in English and in Finnish:
524   http://www.jukkarannila.fi/lausunnot.html
525
526
527   [Continues on the next page]

528
529   **ANNEX 2**
530   DISCLAIMERS

531
532   Legal disclaimer:
533   All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
534   member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.
535   This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
536   future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
537   actor making those actions.

538
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