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TO:  
Unit D4: Security In The Digital Age  
Directorate-General for Migration and Home Affairs, DG HOME  
European Commission

**Ref. Ares(2022)236041 – 13/01/2022**  
**United Nations Cybercrime Convention – authorising negotiations**

First of all, a lot of thanks to Directorate-General for Migration and Home Affairs (DG HOME) for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:  
– any business secrets  
– any trade secrets  
– any confidential information.

This opinion is public.  
PDF file of this opinion can be added to a relevant web page.

Annex 1 holds information about previous consultations at the European Union level.  
Annex 2 holds information about copyright, licence and disclaimers.

Best Regards,

Jukka S. Rannila  
citizen of Finland  
signed electronically

[Continues on the next page]

41

**42 About previous consultations / Repeating several issues**

43

44 Annex 1 holds information about previous consultations. I have repeated the same issues several  
45 times and previous consultation documents can be assessed critically. Different units of the  
46 European Commission already know something about my previous opinions.

47

**48 Highlighting only some issues**

49

50 This opinion does not handle all issues which are mentioned on the consultation document. I have  
51 presented different issues to different units of the European Commission. Generally speaking many  
52 proposals are already implemented and therefore I don't present all possible issues based on this  
53 consultation.

54

**55 The consultation document is technologically neutral and does not mention specific company  
56 names**

57

58 It is fully understandable that the consultation document is technologically neutral. It is also fully  
59 understandable that the consultation document does not mention specific company names.

60

**61 Book / The Internet Trap / Mentioning specific company names**

62

63 I recommend reading the book by Matthew Hindman. Matthew Hindman describes digital economy  
64 with specific company names.

65

66 **Hindman, M. (2018). The Internet Trap: How the digital economy builds monopolies  
67 and undermines democracy. Princeton, New Jersey: Princeton University Press.**

68

69 I read the Finnish version of the book.

70

71 **Hindman, M. (2019). Internet-ansa: Miten digitaalinen talous rakentaa monopoleja ja  
72 nakertaa demokratiaa (K. Pietiläinen, Translator). Helsinki: Terra Cognita.**

73

**74 The darker side of the digital world**

75

76 It can be noted that there is the darker side of the digital world. The European Commission (check  
77 annex 1 for previous consultations) has organised some consultations which handle this darker side  
78 of the digital world.

79

80 Naturally we should be aware of different problems with the digital world when advancing different  
81 policies related to the digital world.

82

**83 What should be negotiated?**

84

85 I have advocated one place/service for informing different information technology problems. At the

86 moment there are several possibilities for informing different information technology problems.

87

88 Examples for informing information technology problems are following:

89

- 90 • Spamhouse Project <sup>1</sup> for tracking email spammers and spam-related activity
- 91 • SpamCop <sup>2</sup> service for reporting spam
- 92 • Common Vulnerabilities and Exposures (CVE) <sup>3</sup> service for informing information-
- 93 security vulnerabilities and exposures
- 94 • Forum of Incident Response and Security Teams <sup>4</sup>
- 95 • computer emergency response team (CERT) – also national CERT teams
- 96 • CSIRT Virus Watch <sup>5</sup>
- 97 • Scamdex <sup>6</sup>
- 98 • providers of different technology solutions have their own reporting services.

99

100 **Opinion: At the moment there are too many places/services for informing different**

101 **information technology problems.**

102

103 **Opinion: There should be just one place/service for informing different information**

104 **technology problems.**

105

106 **Opinion: Global co-operation is needed since cybercrime is a global issue.**

107

108 **Proposals for negotiations**

109

110 **Proposal: Negotiations related to United Nations Cybercrime Convention can be**

111 **supported generally.**

112

113 **Proposal: European Union should support creation of one global place/service which**

114 **could be used for informing all information technology problems including cybercrime**

115 **problems.**

116

117

118 **Good luck!!!**

119

120 This opinion is quite limited. Hopefully there are other constructive ideas presented in other

121 opinions. This remains to be seen.

122

123 [Continues on the next page]

1 <https://www.spamhaus.org>

2 <https://www.spamcop.net>

3 <https://www.cve.org>

4 <https://www.first.org>

5 <http://www.csirt.org>

6 <http://www.scamdex.com>

124

**ANNEX 1**

125 My opinions to the previous and relevant consultations – there consultations were mostly organised  
126 by the European Commission. General page to all consultations – both in English and in Finnish:

127 <http://www.jukkarannila.fi/lausunnot.html>

128

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

130 [http://www.jukkarannila.fi/lausunnot.html#nro\\_1](http://www.jukkarannila.fi/lausunnot.html#nro_1)

131

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

133 [http://www.jukkarannila.fi/lausunnot.html#nro\\_2](http://www.jukkarannila.fi/lausunnot.html#nro_2)

134

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

137 [http://www.jukkarannila.fi/lausunnot.html#nro\\_3](http://www.jukkarannila.fi/lausunnot.html#nro_3)

138

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

140 [http://www.jukkarannila.fi/lausunnot.html#nro\\_5](http://www.jukkarannila.fi/lausunnot.html#nro_5)

141

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

143 [http://www.jukkarannila.fi/lausunnot.html#nro\\_6](http://www.jukkarannila.fi/lausunnot.html#nro_6)

144

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

146 [http://www.jukkarannila.fi/lausunnot.html#nro\\_8](http://www.jukkarannila.fi/lausunnot.html#nro_8)

147

148 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS  
149 proposal for comments

150 [http://www.jukkarannila.fi/lausunnot.html#nro\\_9](http://www.jukkarannila.fi/lausunnot.html#nro_9)

151

152 EN: Opinion 15: Collective Redress

153 [http://www.jukkarannila.fi/lausunnot.html#nro\\_15](http://www.jukkarannila.fi/lausunnot.html#nro_15)

154

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

156 [http://www.jukkarannila.fi/lausunnot.html#nro\\_17](http://www.jukkarannila.fi/lausunnot.html#nro_17)

157

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

159 [http://www.jukkarannila.fi/lausunnot.html#nro\\_18](http://www.jukkarannila.fi/lausunnot.html#nro_18)

160

161 EN: Opinion 19: Official Acknowledgement by the Commission

162 [http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)

163

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

165 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)

166

167 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal

168 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)

- 169 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
170 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
171
- 172 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
173 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
174
- 175 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
176 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
177
- 178 EN: Opinion 30: Internet Filtering  
179 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
180 NOTE: Organised by the European Committee for Standardization (CEN) <sup>7</sup>  
181
- 182 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
183 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
184
- 185 EN: Opinion 34: REMIT Registration Format  
186 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
187 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>8</sup>  
188
- 189 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
190 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
191
- 192 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
193 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
194
- 195 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
196 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
197
- 198 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
199 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
200
- 201 EN: Opinion 41: AT.39398: observations on the proposed commitments  
202 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
203
- 204 EN: Opinion 42: Opening up Education  
205 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)  
206
- 207 EN: Opinion 43: Publication of extracts of the European register of market participants  
208 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
209 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
210  
211

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

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

- 212 EN: Opinion 44: Evaluation policy guidelines  
213 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
214
- 215 EN: Opinion 45: About ICT standardisation  
216 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
217
- 218 EN: Opinion 46: Review of the EU copyright rules  
219 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
220
- 221 EN: Opinion 51: European Area of Skills and Qualifications  
222 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
223
- 224 EN: Opinion 52: Trusted Cloud Europe Survey  
225 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
226
- 227 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
228 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
229 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
230
- 231 EN: Opinion 55: European Energy Regulation  
232 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
233 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
234
- 235 EN: Opinion 59: Green paper on mobile Health  
236 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
237
- 238 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
239 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
240
- 241 EN: Opinion 61: European Register of Products Containing Nanomaterials  
242 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
243
- 244 EN: Opinion 64: Corporate Social Responsibility - European Commission  
245 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
246
- 247 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
248 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
249
- 250 EN: Opinion 68: European Network Code Stakeholder Committees  
251 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
252 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
253
- 254 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
255 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
256 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

- 257 EN: Opinion 74: Enabling the Internet of Things  
258 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
259 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) <sup>9</sup>  
260  
261 EN: Opinion 80: Mandatory Transparency Register  
262 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
263  
264 EN: Opinion 84: Revision of the European Interoperability Framework  
265 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
266  
267 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
268 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
269  
270 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
271 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
272  
273 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
274 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
275 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
276  
277 EN: Opinion 93: Safety of apps and other non-embedded software  
278 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
279  
280 EN: Opinion 95: Targeted consultation on eForms  
281 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
282  
283 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)  
284 [http://www.jukkarannila.fi/lausunnot.html#nro\\_97](http://www.jukkarannila.fi/lausunnot.html#nro_97)  
285  
286 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals  
287 [http://www.jukkarannila.fi/lausunnot.html#nro\\_98](http://www.jukkarannila.fi/lausunnot.html#nro_98)  
288  
289 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy  
290 Regulators. Recast  
291 [http://www.jukkarannila.fi/lausunnot.html#nro\\_99](http://www.jukkarannila.fi/lausunnot.html#nro_99)  
292  
293 EN: Opinion 100: Protection of personal data (EU)  
294 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)  
295  
296 EN: Opinion 101: Governance of the Energy Union  
297 [http://www.jukkarannila.fi/lausunnot.html#nro\\_101](http://www.jukkarannila.fi/lausunnot.html#nro_101)  
298  
299 EN: Opinion 102: Smart Wearables  
300 [http://www.jukkarannila.fi/lausunnot.html#nro\\_102](http://www.jukkarannila.fi/lausunnot.html#nro_102)

<sup>9</sup> <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 301 EN: Opinion 106: Review of the European Union Agency for Network and Information Security  
302 (ENISA)  
303 [http://www.jukkarannila.fi/lausunnot.html#nro\\_106](http://www.jukkarannila.fi/lausunnot.html#nro_106)  
304
- 305 EN: Opinion 108: Single Digital Gateway  
306 [http://www.jukkarannila.fi/lausunnot.html#nro\\_108](http://www.jukkarannila.fi/lausunnot.html#nro_108)  
307
- 308 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code  
309 [http://www.jukkarannila.fi/lausunnot.html#nro\\_110](http://www.jukkarannila.fi/lausunnot.html#nro_110)  
310
- 311 EN: Opinion 111: Interoperability of information systems for migration and security  
312 [http://www.jukkarannila.fi/lausunnot.html#nro\\_111](http://www.jukkarannila.fi/lausunnot.html#nro_111)  
313
- 314 EN: Opinion 113: Transform of health and care  
315 [http://www.jukkarannila.fi/lausunnot.html#nro\\_113](http://www.jukkarannila.fi/lausunnot.html#nro_113)  
316
- 317 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the  
318 Internet  
319 [http://www.jukkarannila.fi/lausunnot.html#nro\\_114](http://www.jukkarannila.fi/lausunnot.html#nro_114)  
320 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
321
- 322 EN: Opinion 118: Fake news and online disinformation  
323 [http://www.jukkarannila.fi/lausunnot.html#nro\\_118](http://www.jukkarannila.fi/lausunnot.html#nro_118)  
324
- 325 EN: Opinion 119: European Social Security Number  
326 [http://www.jukkarannila.fi/lausunnot.html#nro\\_119](http://www.jukkarannila.fi/lausunnot.html#nro_119)  
327
- 328 EN: Opinion 120: European Labour Authority  
329 [http://www.jukkarannila.fi/lausunnot.html#nro\\_120](http://www.jukkarannila.fi/lausunnot.html#nro_120)  
330
- 331 EN: Opinion 121: 2nd Data Package  
332 [http://www.jukkarannila.fi/lausunnot.html#nro\\_121](http://www.jukkarannila.fi/lausunnot.html#nro_121)  
333
- 334 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European  
335 Cybersecurity Research and Competence Centre  
336 [http://www.jukkarannila.fi/lausunnot.html#nro\\_122](http://www.jukkarannila.fi/lausunnot.html#nro_122)  
337
- 338 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF  
339 THE COUNCIL on the re-use of public sector information (recast)  
340 [http://www.jukkarannila.fi/lausunnot.html#nro\\_123](http://www.jukkarannila.fi/lausunnot.html#nro_123)  
341
- 342 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents  
343 [http://www.jukkarannila.fi/lausunnot.html#nro\\_125](http://www.jukkarannila.fi/lausunnot.html#nro_125)  
344  
345



- 346 EN: Opinion 128: Summertime arrangements  
347 [http://www.jukkarannila.fi/lausunnot.html#nro\\_128](http://www.jukkarannila.fi/lausunnot.html#nro_128)  
348
- 349 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange  
350 [http://www.jukkarannila.fi/lausunnot.html#nro\\_129](http://www.jukkarannila.fi/lausunnot.html#nro_129)  
351
- 352 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data  
353 [http://www.jukkarannila.fi/lausunnot.html#nro\\_132](http://www.jukkarannila.fi/lausunnot.html#nro_132)  
354
- 355 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement  
356 ("eForms")  
357 [http://www.jukkarannila.fi/lausunnot.html#nro\\_133](http://www.jukkarannila.fi/lausunnot.html#nro_133)  
358
- 359 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by  
360 UCC  
361 [http://www.jukkarannila.fi/lausunnot.html#nro\\_134](http://www.jukkarannila.fi/lausunnot.html#nro_134)  
362
- 363 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)  
364 [http://www.jukkarannila.fi/lausunnot.html#nro\\_139](http://www.jukkarannila.fi/lausunnot.html#nro_139)  
365
- 366 EN: Opinion 141: Farm Accountancy Data Network  
367 [http://www.jukkarannila.fi/lausunnot.html#nro\\_141](http://www.jukkarannila.fi/lausunnot.html#nro_141)  
368
- 369 EN: Opinion 142: Horizon Europe (two consultations)  
370 [http://www.jukkarannila.fi/lausunnot.html#nro\\_142](http://www.jukkarannila.fi/lausunnot.html#nro_142)  
371
- 372 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation  
373 (evaluation)  
374 [http://www.jukkarannila.fi/lausunnot.html#nro\\_144](http://www.jukkarannila.fi/lausunnot.html#nro_144)  
375
- 376 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative  
377 [http://www.jukkarannila.fi/lausunnot.html#nro\\_146](http://www.jukkarannila.fi/lausunnot.html#nro_146)  
378 NOTE: Organised by the European Committee for Standardization (CEN)  
379
- 380 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems  
381 [http://www.jukkarannila.fi/lausunnot.html#nro\\_147](http://www.jukkarannila.fi/lausunnot.html#nro_147)  
382
- 383 EN: Opinion 152: Revision of the Non-Financial Reporting Directive  
384 [http://www.jukkarannila.fi/lausunnot.html#nro\\_152](http://www.jukkarannila.fi/lausunnot.html#nro_152)  
385
- 386 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation  
387 [http://www.jukkarannila.fi/lausunnot.html#nro\\_154](http://www.jukkarannila.fi/lausunnot.html#nro_154)  
388  
389  
390

- 391 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year  
392 2021  
393 [http://www.jukkarannila.fi/lausunnot.html#nro\\_156](http://www.jukkarannila.fi/lausunnot.html#nro_156)  
394
- 395 EN: Opinion 159: EU competition law - market definition notice (evaluation)  
396 [http://www.jukkarannila.fi/lausunnot.html#nro\\_159](http://www.jukkarannila.fi/lausunnot.html#nro_159)  
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