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TO:
Units A1 and A2
Directorate-General for Competition
European Commission

**Evaluation of the Commission Notice on the definition of relevant market for the purposes of
Community competition law**

First of all, a lot of thanks to the Directorate-General for Competition 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 consultation documents. 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 Highlighting especially markets defined by information technology solutions

56

57 There have been several antitrust cases related to different information technology solutions – e.g.
58 Microsoft, IBM, Reuters and VISA. I have published opinions related to those antitrust cases – i.e.
59 Microsoft, IBM, Reuters and VISA.

60

61 Five basic functions for all information technology solutions

62

63 Generally speaking all information technology solutions have five basic functions:

64

- 65 • retrieve
- 66 • add
- 67 • change
- 68 • remove
- 69 • administration.

70

71 Generally speaking most used function is retrieving information from different systems.

72

73 Black box – Information technology solutions

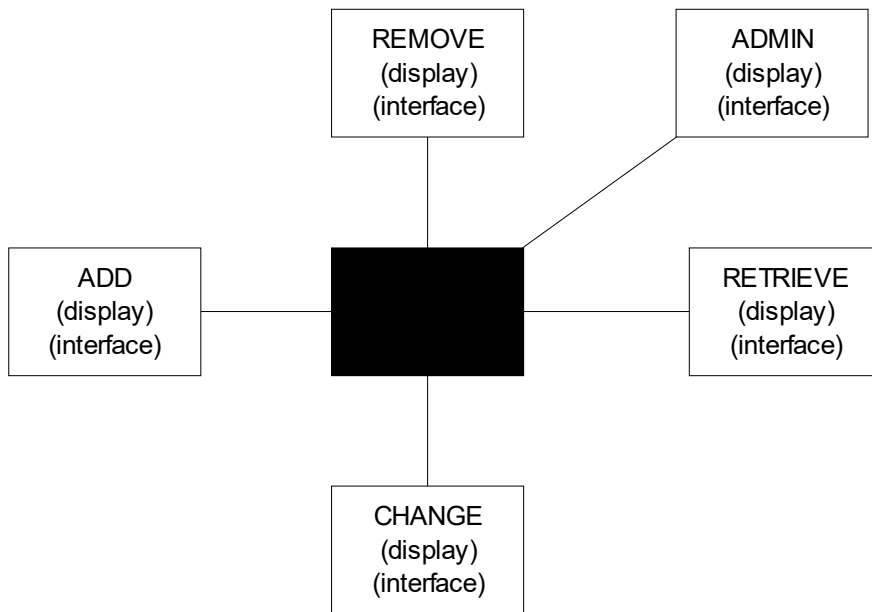
74

75 Usually we are using information systems without knowledge about internal functions – this can be
76 described as black box solution.

77

78 In many cases four basic functions (add, remove, change, retrieve) are working well without
79 problems (black box).

80



81
82

83 Here we can note that providers of different information technology can read data of some
84 information technology solutions. Providers of different information technology solutions can also
85 develop programs and machinery.

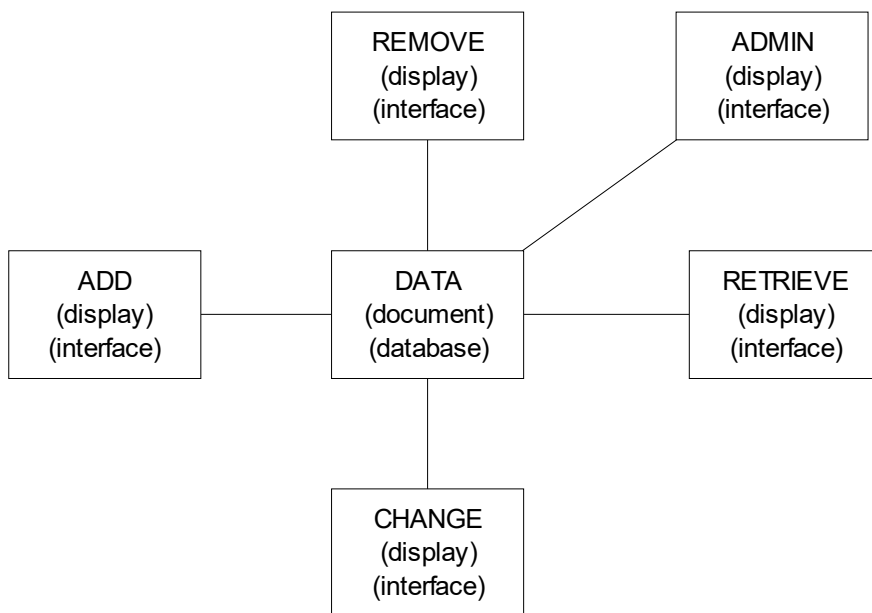
86

87 **White box – Information technology solutions**

88

89 In some cases (open of free software) information about programs and machinery can be accessed
90 by several stakeholders – i.e. white box.

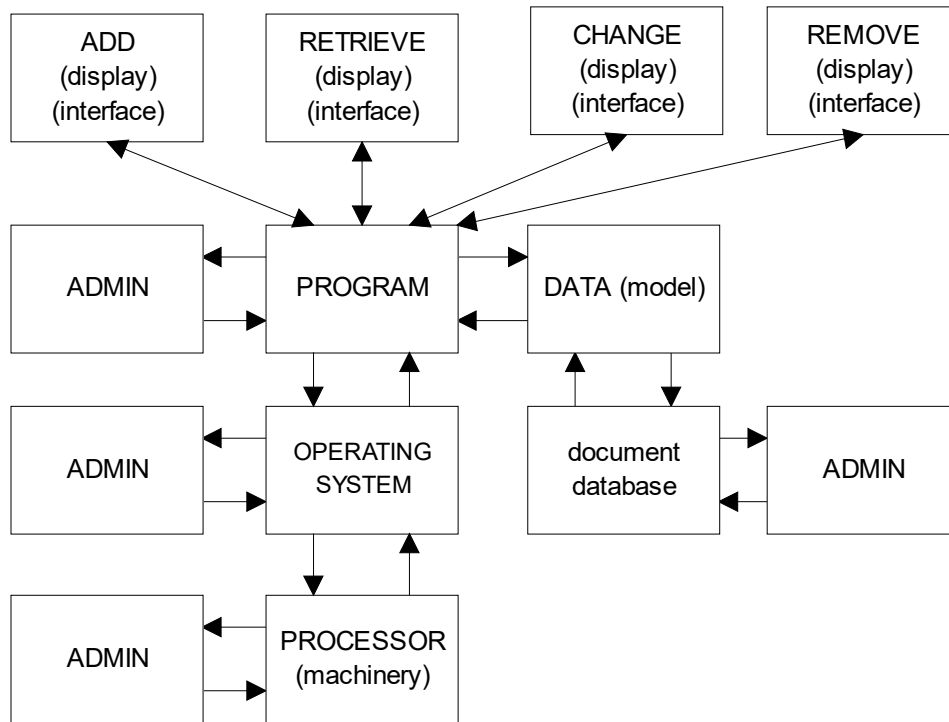
91



92

93 **Adding more details for information technology solutions**

94



95

96

97 All information technology solutions have also processor(s) (machinery), operating system(s) and
 98 program(s). Processor(s) (machinery), operating system(s) and program(s) all need administration
 99 for keeping a system up-to-date. All programs handle data in some format and data can be
 100 database(s) and/or document(s).

101

102 **Owner, member, agreement, standards, openness and closeness**

103

104 Here we can note the difference between owners, agreements and members. In reality ownerships
 105 agreements and memberships cause very complex networks, and those networks are changing all
 106 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
 107 entities, life-cycles, etc.

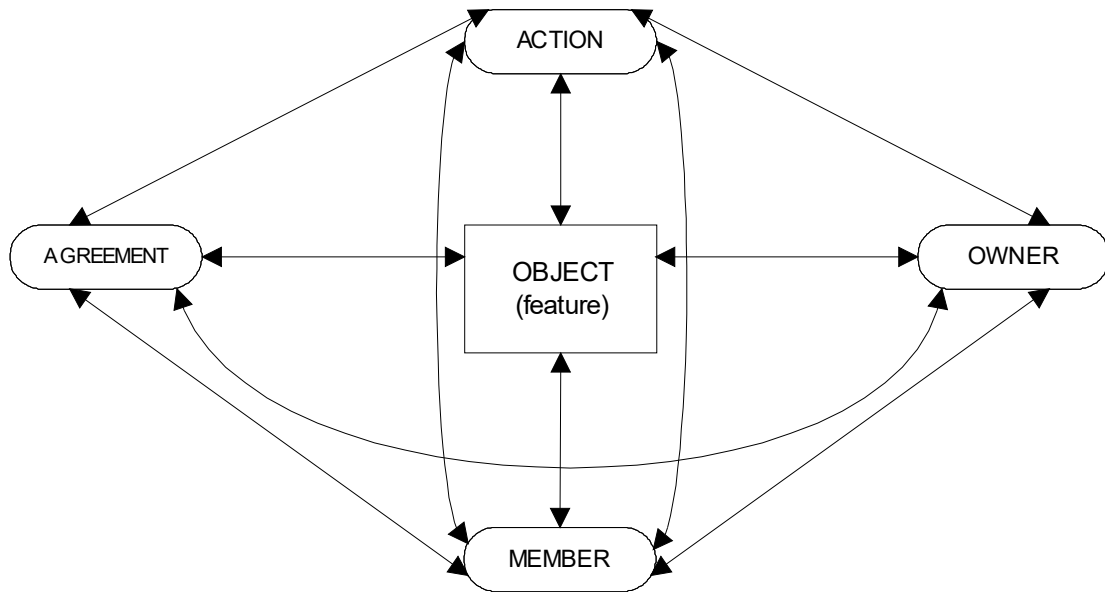
108

109 Here we can note that ownership, agreement and membership are interlinked in different ways.
 110 Generally speaking average usage of a system means a unique combination of ownership,
 111 agreement and membership. When everything works fine there are not problems. However changes
 112 with ownership, agreement and membership can result difficult situations.

113

114 All previously mentioned issues can be based on ownership, membership and agreements. There
 115 can be also different standards, which can be open or closed.

116



Note: The relations between different aspects of information systems can result rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.

Based on previous presentations it is possible to present following table.

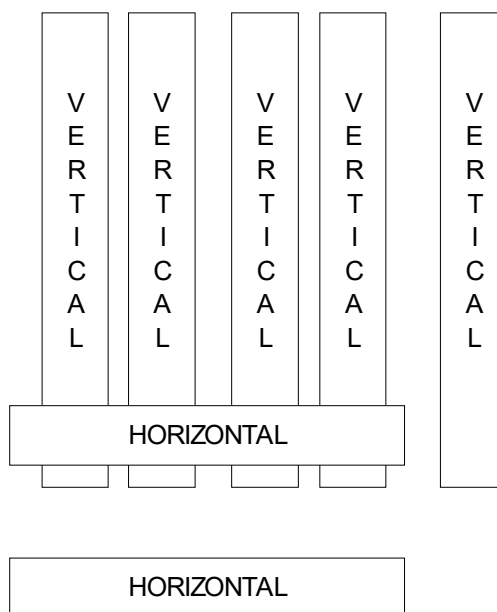
	Owner? Member? Agreement?	Standards?	OPEN	CLOSED
1. Device / Machinery				
2. Operating system				
3. Program(s)				
4. Data models / Conceptual models				
5. Documents				
6. Databases				
7. Communications				
8. Retrieve / Interface / Display				
9. Add / Interface / Display				
10. Remove / Interface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

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125 **Standards / horizontal and vertical standards**

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127

128

129 There are differences between horizontal and vertical standards. A simple example is naturally
 130 email solutions. There are several vertical standards when creating technically email solutions. Then
 131 there are horizontal standards which enable sending messages between technically different email
 132 solutions.

133

134 Horizontal standards enables technological solutions which can work together. Horizontal standards
 135 hides different complexities in information systems.

136

137 **Proposal: There could be separation of horizontal standards and vertical standards.**

138

139 Personally I have advocated using different horizontal standards.

140

141 Here we can note some problems:

- 142 • some systems are based on **de-facto** standards
- 143 • some systems are based on **de-jure** standards
- 144 • there can be confrontations between **de-facto** and **de-jure** standards
- 145 • there can be a monopoly situation in some domain
- 146 • some standards may inhibit possible actions of some stakeholders
- 147 • there can be a standard war on some domains
- 148 • standards have different life-cycles
- 149 • systems have different life-cycles
- 150 • there can be mismatches between different life-cycles
- 151 • there can be failed standards
- 152 • there can be deprecated standards.

153

154 It is quite normal situation in the information technology field that there are competing standards
155 for some application field. Therefore there are all the time ongoing “standards wars” or “format
156 wars”. The information technology standards tend to be interrelated and one “standards war” or
157 “format war” can lead to another similar situation.

158

159 I have advocated open standards even though in some cases open standards are not de facto
160 standards. In practice public sector has very important role, when some standards are competing in
161 the market place. Because public sector has a considerable power when buying/developing
162 information systems and therefore public sector can sometimes direct markets to certain standards.
163 Therefore there should be serious vigilance when assessing different standards and “standards” in
164 some application fields.

165

166 **What this means to definition of relevant market(s)?**

167

168 Based on previous presentations there are several markets based on information technology
169 solutions. Here are some markets based on information technology solutions:

170

- 171 • **data of some system(s)**
- 172 • **retrieving, adding, changing and removing data in some system(s)**
- 173 • **maintenance of some system(s)**
- 174 • **programs**
- 175 • **operating systems**
- 176 • **processors (machinery)**
- 177 • **different standards – open and closed standards**
- 178 • **ownership of some system(s)**
- 179 • **usage of different system(s) based on ownership, membership or agreements**

180

181 There can be even more markets based on information technology solutions.

182

183 **What this means for definition of relevant market(s)?**

184

185 When thinking definition of relevant market(s) based on information technology solutions there can
186 be several (sub)markets.

187

188 **PROPOSAL: When thinking definition of relevant market(s) based on information**
189 **technology solutions there can be several (sub)markets which could be assessed very**
190 **carefully.**

191

192 **Another example: different application programming interface (APIS)**

193

194 There can be several APIs implemented in different information system. The natural problem with
195 APIs is timeline of different systems which implement different APIs. There can be new and old
196 systems which implement different APIs.

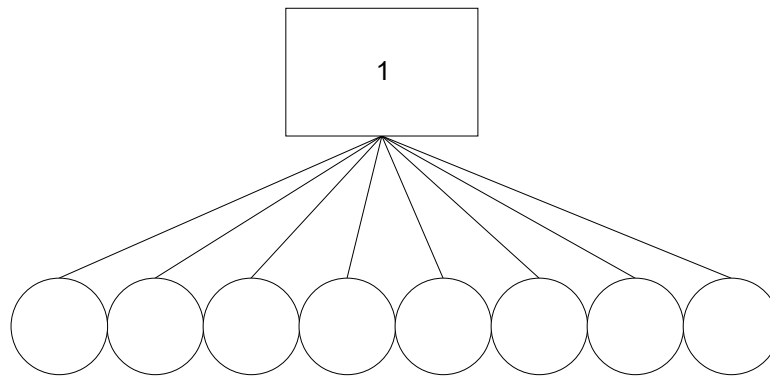
197

198 **Proposal: Different information systems (EU-wide systems and member state systems)**
199 **could be assessed based on *implementation of different APIs.***

200

201 Here can be noted that there can several APIs implemented in different information systems.

202



203

204

205 One issue can be different versions of APIs. Based on timelines of different systems there can be
206 different API versions in use.

207

208 **Another example: more and more identifiers (ID)**

209

210 In the previous consultations there has been discussion about different identifiers (ID) in different
211 systems. It can be noted from the previous opinions, that there will be several and different
212 identifiers (ID) for different levels. At the European Union level there can be several identifiers
213 (ID), e.g. following:

214

215 * global identifiers (ID)

216 * EU-wide identifiers (ID)

217 * general member state identifiers (ID)

218 * several identifiers (ID) in member states.

219

220 It can be noted, that some member states (EU) are federations, and different federal states can have
221 their own identifiers (ID).

222

223 Examples of these identifiers are following:

224

225 1) Facebook ID for an individual person

226 2) Facebook ID for the individual up-dates of individuals

227 3) Data Universal Numbering System (D-U-N-S)

228 4) Reuters instruments codes (RICs)

229 5) Social security code for individual citizens in the European Union member states

230 6) Business identity code for a company in an European Union member state

231 7) Value added tax code for a company in an European Union member state.

232

233 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
234 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
235 of using IDs from privately owned information systems.

236

237 **Summary – identifiers and application programming interfaces (API)**

238

239 Identifiers (ID) and application programming interfaces (API) present examples for defining a
240 market based on some information technology solutions.

241

242 **Antitrust – NACE CODE**

243

244 European Commission provides a search solution for searching different antitrust cases based on
245 NACE code.

246

247 **Antitrust cases**

248 <https://ec.europa.eu/competition/elojade/isef/index.cfm>

249

250 NACE code **J** (Information and communication) means some unique characteristics which could be
251 assessed carefully.

252

253 **Final remarks – possibilities for defining markets**

254

255 Based on previous issues it is possible to notice several possibilities for defining market based on
256 information technology.

257

258

259 **Good luck!!!**

260

261 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
262 opinions. This remains to be seen.

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265 [Continues on the next page]

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ANNEX 1

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

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

My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission.

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

http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century

http://www.jukkarannila.fi/lausunnot.html#nro_2

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

http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

http://www.jukkarannila.fi/lausunnot.html#nro_5

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

http://www.jukkarannila.fi/lausunnot.html#nro_6

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

http://www.jukkarannila.fi/lausunnot.html#nro_8

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

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress

http://www.jukkarannila.fi/lausunnot.html#nro_15

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

http://www.jukkarannila.fi/lausunnot.html#nro_17

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

http://www.jukkarannila.fi/lausunnot.html#nro_18

- 311
312 EN: Opinion 19: Official Acknowledgement by the Commission
313 http://www.jukkarannila.fi/lausunnot.html#nro_19
314
315 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
316 http://www.jukkarannila.fi/lausunnot.html#nro_20
317
318 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
319 http://www.jukkarannila.fi/lausunnot.html#nro_21
320
321 EN: Opinion 23: Public consultation on the review of the European Standardisation System
322 http://www.jukkarannila.fi/lausunnot.html#nro_23
323
324 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
325 http://www.jukkarannila.fi/lausunnot.html#nro_27
326
327 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
328 http://www.jukkarannila.fi/lausunnot.html#nro_28
329
330 EN: Opinion 30: Internet Filtering
331 http://www.jukkarannila.fi/lausunnot.html#nro_30
332 NOTE: Organised by the European Committee for Standardization (CEN) ¹
333
334 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
335 http://www.jukkarannila.fi/lausunnot.html#nro_32
336
337 EN: Opinion 34: REMIT Registration Format
338 http://www.jukkarannila.fi/lausunnot.html#nro_34
339 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
340
341 EN: Opinion 35: Exploiting the employment potential of the personal and household services
342 http://www.jukkarannila.fi/lausunnot.html#nro_35
343
344 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
345 http://www.jukkarannila.fi/lausunnot.html#nro_37
346
347 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
348 http://www.jukkarannila.fi/lausunnot.html#nro_39
349
350 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
351 http://www.jukkarannila.fi/lausunnot.html#nro_40
352
353

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

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

- 354 EN: Opinion 41: AT.39398: observations on the proposed commitments
355 http://www.jukkarannila.fi/lausunnot.html#nro_41
356
- 357 EN: Opinion 42: Opening up Education
358 http://www.jukkarannila.fi/lausunnot.html#nro_42
359
- 360 EN: Opinion 43: Publication of extracts of the European register of market participants
361 http://www.jukkarannila.fi/lausunnot.html#nro_43
362 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
363
- 364 EN: Opinion 44: Evaluation policy guidelines
365 http://www.jukkarannila.fi/lausunnot.html#nro_44
366
- 367 EN: Opinion 45: About ICT standardisation
368 http://www.jukkarannila.fi/lausunnot.html#nro_45
369
- 370 EN: Opinion 46: Review of the EU copyright rules
371 http://www.jukkarannila.fi/lausunnot.html#nro_46
372
- 373 EN: Opinion 51: European Area of Skills and Qualifications
374 http://www.jukkarannila.fi/lausunnot.html#nro_51
375
- 376 EN: Opinion 52: Trusted Cloud Europe Survey
377 http://www.jukkarannila.fi/lausunnot.html#nro_52
378
- 379 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
380 http://www.jukkarannila.fi/lausunnot.html#nro_53
381 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
382
- 383 EN: Opinion 55: European Energy Regulation
384 http://www.jukkarannila.fi/lausunnot.html#nro_55
385 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
386
- 387 EN: Opinion 59: Green paper on mobile Health
388 http://www.jukkarannila.fi/lausunnot.html#nro_59
389
- 390 EN: Opinion 60: Cross-border inheritance tax problems within the EU
391 http://www.jukkarannila.fi/lausunnot.html#nro_60
392
- 393 EN: Opinion 61: European Register of Products Containing Nanomaterials
394 http://www.jukkarannila.fi/lausunnot.html#nro_61
395
- 396 EN: Opinion 64: Corporate Social Responsibility - European Commission
397 http://www.jukkarannila.fi/lausunnot.html#nro_64
398

- 399 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
400 http://www.jukkarannila.fi/lausunnot.html#nro_66
401
- 402 EN: Opinion 68: European Network Code Stakeholder Committees
403 http://www.jukkarannila.fi/lausunnot.html#nro_68
404 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
405
- 406 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
407 http://www.jukkarannila.fi/lausunnot.html#nro_71
408 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
409
- 410 EN: Opinion 74: Enabling the Internet of Things
411 http://www.jukkarannila.fi/lausunnot.html#nro_74
412 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ³
413
- 414 EN: Opinion 80: Mandatory Transparency Register
415 http://www.jukkarannila.fi/lausunnot.html#nro_80
416
- 417 EN: Opinion 84: Revision of the European Interoperability Framework
418 http://www.jukkarannila.fi/lausunnot.html#nro_84
419
- 420 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
421 http://www.jukkarannila.fi/lausunnot.html#nro_86
422
- 423 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
424 http://www.jukkarannila.fi/lausunnot.html#nro_88
425
- 426 EN: Opinion 89: BEREC Guidelines for net neutrality rules
427 http://www.jukkarannila.fi/lausunnot.html#nro_89
428 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
429
- 430 EN: Opinion 93: Safety of apps and other non-embedded software
431 http://www.jukkarannila.fi/lausunnot.html#nro_93
432
- 433 EN: Opinion 95: Targeted consultation on eForms
434 http://www.jukkarannila.fi/lausunnot.html#nro_95
435
- 436 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
437 http://www.jukkarannila.fi/lausunnot.html#nro_97
438
- 439 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
440 http://www.jukkarannila.fi/lausunnot.html#nro_98
441
442

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

- 443 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
444 Regulators. Recast
445 http://www.jukkarannila.fi/lausunnot.html#nro_99
446
- 447 EN: Opinion 100: Protection of personal data (EU)
448 http://www.jukkarannila.fi/lausunnot.html#nro_100
449
- 450 EN: Opinion 101: Governance of the Energy Union
451 http://www.jukkarannila.fi/lausunnot.html#nro_101
452
- 453 EN: Opinion 102: Smart Wearables
454 http://www.jukkarannila.fi/lausunnot.html#nro_102
455
- 456 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
457 (ENISA)
458 http://www.jukkarannila.fi/lausunnot.html#nro_106
459
- 460 EN: Opinion 108: Single Digital Gateway
461 http://www.jukkarannila.fi/lausunnot.html#nro_108
462
- 463 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
464 http://www.jukkarannila.fi/lausunnot.html#nro_110
465
- 466 EN: Opinion 111: Interoperability of information systems for migration and security
467 http://www.jukkarannila.fi/lausunnot.html#nro_111
468
- 469 EN: Opinion 113: Transform of health and care
470 http://www.jukkarannila.fi/lausunnot.html#nro_113
471
- 472 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
473 Internet
474 http://www.jukkarannila.fi/lausunnot.html#nro_114
475 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
476
- 477 EN: Opinion 118: Fake news and online disinformation
478 http://www.jukkarannila.fi/lausunnot.html#nro_118
479
- 480 EN: Opinion 119: European Social Security Number
481 http://www.jukkarannila.fi/lausunnot.html#nro_119
482
- 483 EN: Opinion 120: European Labour Authority
484 http://www.jukkarannila.fi/lausunnot.html#nro_120
485
- 486 EN: Opinion 121: 2nd Data Package
487 http://www.jukkarannila.fi/lausunnot.html#nro_121

- 488
489 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
490 Cybersecurity Research and Competence Centre
491 http://www.jukkarannila.fi/lausunnot.html#nro_122
492
493 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
494 THE COUNCIL on the re-use of public sector information (recast)
495 http://www.jukkarannila.fi/lausunnot.html#nro_123
496
497 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
498 http://www.jukkarannila.fi/lausunnot.html#nro_125
499
500 EN: Opinion 128: Summertime arrangements
501 http://www.jukkarannila.fi/lausunnot.html#nro_128
502
503 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
504 http://www.jukkarannila.fi/lausunnot.html#nro_129
505
506 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
507 http://www.jukkarannila.fi/lausunnot.html#nro_132
508
509 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
510 ("eForms")
511 http://www.jukkarannila.fi/lausunnot.html#nro_133
512
513 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
514 UCC
515 http://www.jukkarannila.fi/lausunnot.html#nro_134
516
517 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
518 http://www.jukkarannila.fi/lausunnot.html#nro_139
519
520 EN: Opinion 141: Farm Accountancy Data Network
521 http://www.jukkarannila.fi/lausunnot.html#nro_141
522
523 EN: Opinion 142: Horizon Europe (two consultations)
524 http://www.jukkarannila.fi/lausunnot.html#nro_142
525
526 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
527 (evaluation)
528 http://www.jukkarannila.fi/lausunnot.html#nro_144
529
530 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
531 http://www.jukkarannila.fi/lausunnot.html#nro_146
532 NOTE: Organised by the European Committee for Standardization (CEN)

533

534 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems

535 http://www.jukkarannila.fi/lausunnot.html#nro_147

536

537 EN: Opinion 152: Revision of the Non-Financial Reporting Directive

538 http://www.jukkarannila.fi/lausunnot.html#nro_152

539

540 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation

541 http://www.jukkarannila.fi/lausunnot.html#nro_154

542

543 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
544 2021545 http://www.jukkarannila.fi/lausunnot.html#nro_156

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550 My opinions to the previous and relevant consultations – there consultations were mostly organised
551 by the European Commission. General page to all consultations – both in English and in Finnish:552 <http://www.jukkarannila.fi/lausunnot.html>

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ANNEX 2

560 DISCLAIMERS

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562 Legal disclaimer:

563 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
564 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

565 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
566 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
567 actor making those actions.

568

569 Political disclaimer:

570 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and
571 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal
572 entity making law proposals.

573

574 These opinions are not meant to be extreme-right, moderate-right, extreme-centre, moderate-centre, extreme-left or
575 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of
576 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or
577 worldwide politics.

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