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TO:  
Unit H1  
Directorate-General for Communications Networks, Content and Technology  
European Commission

**Reference: Ares(2018)1598442**  
**Proposal to create a cybersecurity competence network with a European Cybersecurity**  
**Research and Competence Centre**

First of all, a lot of thanks to Directorate-General for Communications Networks, Content and Technology (Unit H1) 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 disclaimers and copyright.

Best Regards,

Jukka S. Rannila  
citizen of Finland  
signed electronically

[Continues on the next page]

41

**42 About previous consultations and opinions**

43

44 Annex 1 holds information about previous consultations and my previous opinions.

45

46 Here we can note that I have repeated the same issues based on previous consultations. Different  
47 units of the European Commission already know something about my previous opinions

48

49 **Note: Previously I have sent opinions to some units of the Directorate-General for**  
50 **Communications Networks, Content and Technology.**

51

**52 Previous international co-operation – The European Centre of Excellence for Countering**  
**53 Hybrid Threats (Hybrid CoE)**

54

55 Here we can that there is already one organisation for international co-operation: <sup>1</sup> The European  
56 Centre of Excellence for Countering Hybrid Threats (Hybrid CoE). On 10 April 2018 there was  
57 following participants for this centre are following: Estonia, Finland, France, Germany, Latvia,  
58 Lithuania, Netherlands, Norway, Poland, Spain, Sweden, the UK and the USA

59

60 **Proposal: Co-operation with The European Centre of Excellence for Countering**  
61 **Hybrid Threats (Hybrid CoE) should be assessed carefully.**

62

**63 One centre (European centre?) for informing different information technology problems**

64

65 I have advocated one for informing different information technology problems. At the moment there  
66 are several possibilities for informing different information technology problems.

67

68 Examples for informing information technology problems are following:

69

- 70 • Spamhouse Project <sup>2</sup> for tracking email spammers and spam-related activity
- 71 • SpamCop <sup>3</sup> service for reporting spam
- 72 • Common Vulnerabilities and Exposures (CVE) <sup>4</sup> for informing information-security  
73 vulnerabilities and exposures
- 74 • Forum of Incident Response and Security Teams <sup>5</sup>
- 75 • computer emergency response team (CERT) – also national CERT teams
- 76 • CSIRT Virus Watch <sup>6</sup>
- 77 • Scamdex <sup>7</sup>
- 78 • providers of different technology solutions have their own reporting services.

79

1 <https://www.hybridcoe.fi/about-us/>

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

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

4 <http://cve.mitre.org>

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

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

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

80 There is one note on inception impact assessment document about fragmentation of the effort, lack  
81 of a dynamic EU-wide ecosystem.

82

83 **Proposal: There could be some work for creating just one service for informing**  
84 **different information technology problems.**

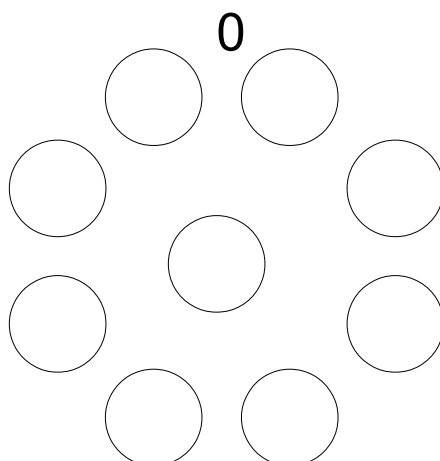
85

86 **Proposal: Possibly there could be just one European service for informing different**  
87 **information technology problems.**

88

89 Like said before (also based on previous opinions) there can be several solutions for informing  
90 different information technology problems. Possibly different services are not connected to other  
91 systems.

92

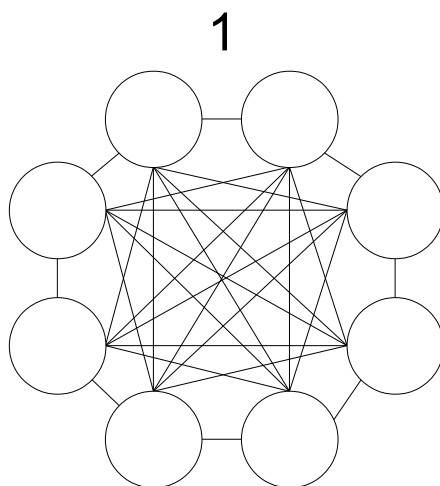


93

94

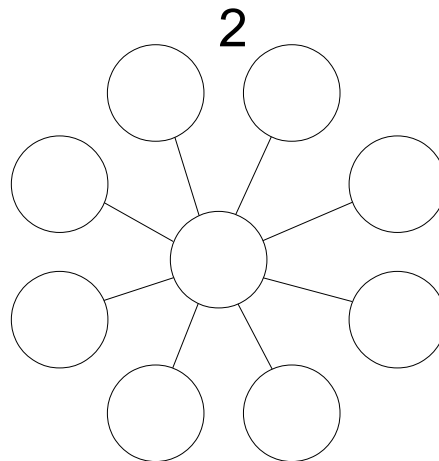
95 Next possibility is complex many-to-many connections. Complex many-to-many connections  
96 causes different problems when there are changes in one system and this mean changes to other  
97 systems.

97



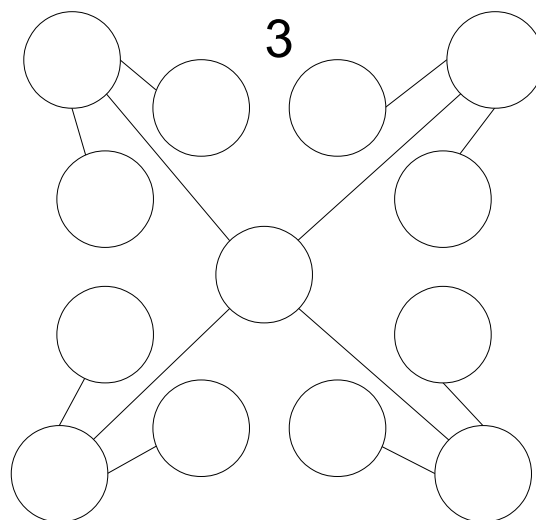
98

99 Next option is just one central system which can connected with several (sub)systems. Problem  
100 with this solution is unwanted outages in one central system when all other (sub)systems have  
101 problems.  
102



103  
104

105 I have advocated hierarchy between systems. There could be one central system which is connected  
106 to some (sub)systems, which can be then connected to other subsystems. This means that unwanted  
107 outages don't affect all possible system at the same time.  
108



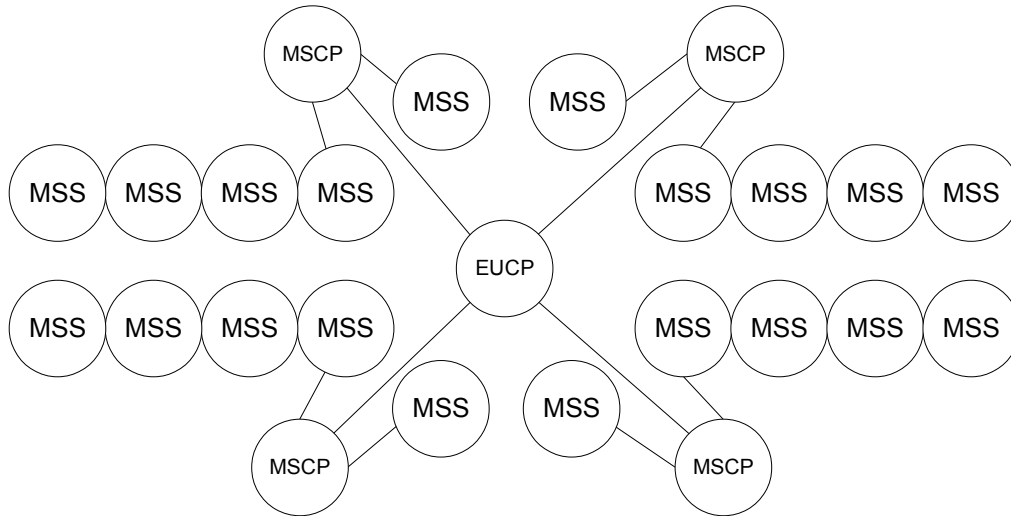
109  
110

### 111 **Back to European Union?**

112

113 I have advocated hierarchy for different European Union information systems. There could be one  
114 European Union Contact Point (EUCP), different Member State Contact Point (MSCP) and  
115 different Member State Systems (MSS).

3



**EUCP: European Contact Point, MSCP: Member Contact Point  
MSS: Member State system**

116  
117  
118  
119

Proposed hierarchy between different European Union information systems allows consolidation for different member state systems. There can be several information systems in one member state. Since there are at the moment 28 member states one central system (European Contact Point) could face serious problems with several one-to-many connections.

124  
125  
126  
127  
128  
129

- 28 connections → 28 member states with one central system (European Contact Point)
- 56 connections → 28 member states with two (2) systems
- 140 connections → 28 member states with five (5) systems
- 280 connections → 28 member states with ten (10) systems

130  
131  
132

Therefore there should be Member State Contact Points (MSCP) for different Member State Systems (MSS).

133  
134

**Proposal: There could be hierarchy for different European Union information systems.**

135  
136  
137

**Proposal: There could be different Member State Contact Points (MSCP) for consolidating different Member State Systems (MSS)**

138  
139  
140

**Proposal: Different Member State Contact Points (MSCP) could be connected to one European Contact Point (EUCP).**

141  
142  
143  
144

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 states. We have to note that there are different

145 systems based on several technological solutions

146

147 **Proposal: There could be some serious work for developing a standardised member**  
148 **state contact points (MSCP).**

149

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

152

153 **Proposal: European Union contact point (EUCP) and member state contact points**  
154 **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at the European**  
155 **Union level.**

156

157 On the inception impact assessment document there is following note.

158

159 Fragmentation of the effort, lack of a dynamic EU-wide ecosystem.

160

161 [some text]

162

163 “The links between the demand (both public and private from various sectors e.g. health,  
164 telecomm, energy, space, defence, finance, transport) and supply side of the cybersecurity  
165 market are not sufficiently well developed resulting in sub-optimal supply of European  
166 products and solutions adapted to different sectors' needs, as well as in insufficient levels of  
167 trust among market players.”

168

169 **Proposal: Cooperation (EUCP ↔ MSCP ↔ MSS) at the European Union level could**  
170 **lead to consolidated services for different stakeholders (both public and private**  
171 **stakeholders) and less different services for informing different information technology**  
172 **problems.**

173

174 **About different standards**

175

176 I have proposed several times to use open horizontal standards when developing different  
177 information systems.

178

179 **Favouring open standards / Favouring horizontal standards**

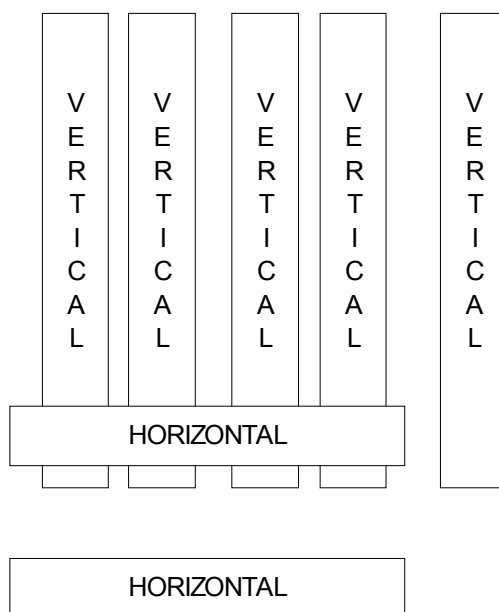
180

181 There are differences between horizontal and vertical standards. A simple example is naturally  
182 email solutions. There are several vertical standards when creating technically email solutions. Then  
183 there are horizontal standards which enable sending messages between technically different email  
184 solutions.

185

186

187 [Continues on the next page]



188  
189

190 **Proposal: There could be assessment of vertical and horizontal standards.**

191

192 **Proposal: Using horizontal standards could be favoured when creating different**  
193 **information systems on the European Union level.**

194

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

197

198 **Opinion: The number of redundant standardisation efforts should be minimal.**

199

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

201

202 **Proposal: There could be different standardisation efforts to horizontal standards and**  
203 **vertical standards**

204

205 Personally I have advocated using different open horizontal standards. For example email standards  
206 (horizontal) are implemented with very different technologies (vertical).

207

208 **Standardisation on several layers**

209

210 On the inception impact assessment document there is following note.

211

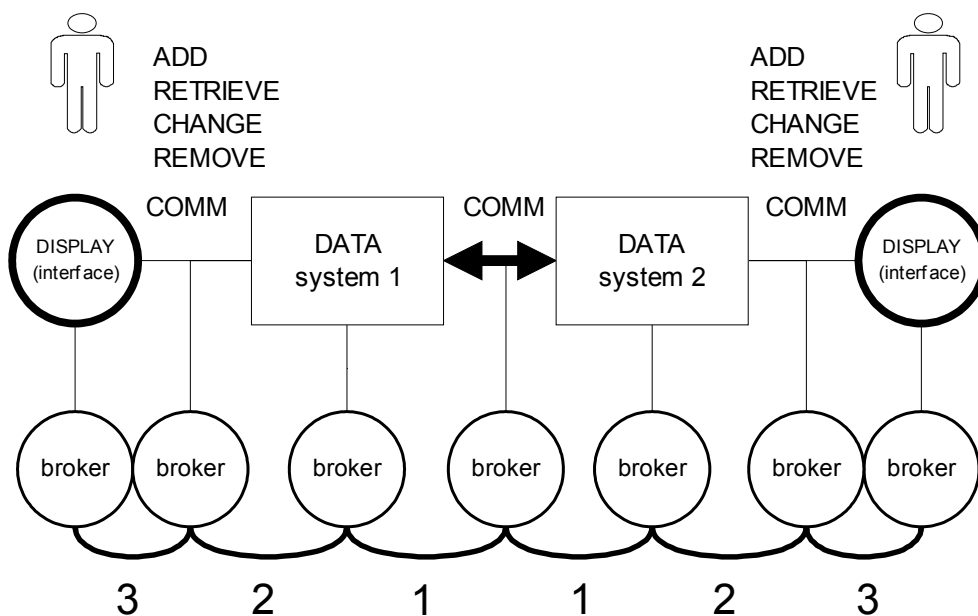
212 Fragmentation of the effort, lack of a dynamic EU-wide ecosystem.

213

214 ”Protecting the public sector as a major challenge but also an opportunity: Not only the  
215 business sector at large struggles to appropriately secure its existing products, services and

216 assets or to design secure innovative products and services (e.g. due to lack of resources,  
 217 skills, different business priorities). Also key cybersecurity assets with relevance to the  
 218 public sector (e.g. blockchain-based solutions, infrastructures supporting quantum key  
 219 distribution enabling highly-secure communications for critical assets and institutions) are  
 220 too costly to be developed and set up other than jointly at the European level.”  
 221

222 Here we can not that there can be different brokers (or trusted third parties) which are user between  
 223 different systems. Here we can note that there can be several standards when there is cooperation  
 224 between different systems.  
 225



226  
 227 **Proposal: (Repetition) There could be some assessments of standardisation on several**  
 228 **layers.**  
 229

230 **Proposal: Different brokers could be assessed as part of previously mentioned**  
 231 **assessments.**  
 232

233 Here we can note that there can be several stakeholder groups using standards. Here we can note  
 234 that different stakeholder groups can be separated. There can be several stakeholder groups which  
 235 can be both public sector and private sector communities.  
 236

237 **Proposal: There could be development of (open) standards for consolidating**  
 238 **standardisation efforts based on several layers.**  
 239

240 **About different identifiers (ID)**  
 241

242 Developing a standardised member state contact point (MSCP) means some work to be done. Here  
 243 we can note that there will be several *identifiers* when developing new systems and maintaining



244 current systems (EUCP ↔ MSCP).

245

246 I have proposed several times to use ***open and public identifiers*** when developing different  
247 information system.

248

#### 249 **More and more new identifiers (ID)**

250

251 In previous consultations there has been discussion about different identifiers (ID) in different  
252 information systems. It can be noted from the previous opinions that there will be several and  
253 different identifiers (ID) for different levels.

254

255 Examples of these identifiers (ID) are following:

256

257 1) Facebook ID for an individual person

258 2) Facebook ID for the individual updates of individuals

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

260 4) Reuters instruments codes (RICs)

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

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

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

264

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

268

269 **Proposal: There could be a systematic review of different identifiers (ID) on different  
270 levels.**

271

272 **Proposal: Possible systematic review of different identifiers (ID) should assess different  
273 situations.**

274

275 Different information systems have also internal identifiers (ID) and external identifiers (ID) for  
276 (possible) public usage. The added value for different stakeholders is provided by combination of  
277 different identifiers (ID) in a specific information system.

278

279 **Proposal: There could be some assessment(s) based on different versions of different  
280 identifiers (ID).**

281

282 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,  
283 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers  
284 (ID), but this consolidation means some serious technical and administrative actions.

285

286 **Proposal: Legacy identifiers (ID) could be assessed seriously.**

287

288 When information about relevant identifiers is collected, there could be a serious assessment of

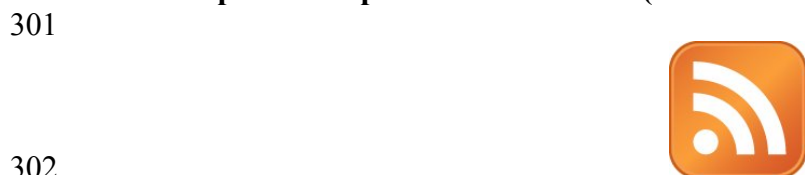
289 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,  
290 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.

291  
292 **Proposal: The nature of different identifiers (ID) could be assessed.**

293  
294 **Proposal: There could be serious negotiations with some providers of identifiers (ID).**

295  
296 In the European Union there has been different anti-trust cases which are related to different private  
297 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several  
298 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.

299  
300 **An example for cooperation: Web feeds (RSS and Atom)**



302  
303  
304 I have advocated usage of web feeds <sup>8</sup> on several previous opinion documents. Actually there are  
305 two standards for web feeds: RSS <sup>9 10</sup> and Atom <sup>11 12 13</sup>.

306  
307 **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**  
308 **informations systems (EU / Member states).**

309  
310 **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**  
311 **time) information for different stakeholder(s) (communities).**

312  
313 **Proposal: There can be different web feeds (RSS and/or Atom) for different**  
314 **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**  
315 **solution.**

316  
317 **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

318  
319 It can be easier to create web feeds in different information systems since web feeds enable  
320 connections without direct system-to-system connections.

321  
322 It can be noted, that different back-office systems (with a wide variety of different technologies) can  
323 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this  
324 kind solutions front-office systems dont need direct system-to-system communications with back-  
325 office systems.

8 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed)

9 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

10 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

11 [https://en.wikipedia.org/wiki/Atom\\_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

12 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

13 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

326

**ANNEX 1**

327

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

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

331

332

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

335

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

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

338

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

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

341

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

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

345

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

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

348

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

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

351

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

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

354

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

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

358

359 EN: Opinion 15: Collective Redress

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

361

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

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

364

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

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

367

368 EN: Opinion 19: Official Acknowledgement by the Commission

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

370

- 371 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
372 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
373
- 374 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
375 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
376
- 377 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
378 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
379
- 380 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
381 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
382
- 383 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
384 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
385
- 386 EN: Opinion 30: Internet Filtering  
387 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
388 NOTE: Organised by the European Committee for Standardization (CEN) <sup>14</sup>  
389
- 390 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
391 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
392
- 393 EN: Opinion 34: REMIT Registration Format  
394 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
395 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>15</sup>  
396
- 397 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
398 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
399
- 400 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
401 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
402
- 403 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
404 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
405
- 406 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
407 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
408
- 409 EN: Opinion 41: AT.39398: observations on the proposed commitments  
410 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
411
- 412 EN: Opinion 42: Opening up Education  
413 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)

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

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

- 414  
415 EN: Opinion 43: Publication of extracts of the European register of market participants  
416 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
417 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
418  
419 EN: Opinion 44: Evaluation policy guidelines  
420 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
421  
422 EN: Opinion 45: About ICT standardisation  
423 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
424  
425 EN: Opinion 46: Review of the EU copyright rules  
426 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
427  
428 EN: Opinion 51: European Area of Skills and Qualifications  
429 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
430  
431 EN: Opinion 52: Trusted Cloud Europe Survey  
432 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
433  
434 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
435 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
436 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
437  
438 EN: Opinion 55: European Energy Regulation  
439 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
440 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
441  
442 EN: Opinion 59: Green paper on mobile Health  
443 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
444  
445 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
446 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
447  
448 EN: Opinion 61: European Register of Products Containing Nanomaterials  
449 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
450  
451 EN: Opinion 64: Corporate Social Responsibility - European Commission  
452 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
453  
454 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
455 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
456  
457  
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- 459 EN: Opinion 68: European Network Code Stakeholder Committees  
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544
- 545 My opinions to the previous and relevant consultations – there consultations were mostly organised  
546 by the European Commission. General page to all consultations – both in English and in Finnish:  
547 <http://www.jukkarannila.fi/lausunnot.html>

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**ANNEX 2**

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