1
2 TO:
3 Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
4 European Commission
5
6 **Reference: Ref. Ares(2019)797630 – 11/02/2019:**
7
8   **Title: Commission Implementing Regulation establishing standard forms for the**
9   **publication of notices in the field of public procurement ("eForms")**
10
11
12 First of all, a lot of thanks to Directorate-General for Internal Market, Industry, Entrepreneurship
13 and SMEs for organising this important consultation.
14
15 This opinion represents an opinion of an individual citizen, not any legal entity.
16
17 This opinion does not contain:
18   –   any business secrets
19   –   any trade secrets
20   –   any confidential information.
21
22 This opinion is public.
23 PDF file of this opinion can be added to a relevant web page.
24
25 Annex 1 holds information about previous consultations at the European Union level.
26 Annex 2 holds information about disclaimers and copyright.
27
28
29
30 Best Regards,
31
32
33
34 Jukka S. Rannila
35 citizen of Finland
36
37 signed electronically
38
39
40 [Continues on the next page]
41

Jukka S. Rannila

OPINION

2 (25)

www.jukkarannila.fi

7 March 2019

Public / WWW

42
43 **PART 1: Supporting different proposals based on proposed Commission Implementing**
44 **Regulation establishing standard forms for the publication of notices in the field of public**
45 **procurement ("eForms")**
46
47 **(1) EU wide procurement procedure identifier**
48
49 Public feedback explanatory note (Chapter 4: Purpose) contains following:
50
51 **Enabling better identification of business opportunities in the EU by introducing an**
52 **EU wide procurement procedure identifier.**
53
54 NOTE: I have advocated several times European Union wide identifiers (ID) based on previous
55 consultations.
56
57 **(2) Collaborative platform**
58
59 Public feedback explanatory note (chapter 5: Support measures) contains following:
60
61 **The Commission will prepare guidance on implementing the standard forms and will**
62 **maintain a collaborative platform for the exchange of best practices and discussion of**
63 **issues.**
64
65 NOTE: I have advocated several times one European Union contact point (EUCP) for cooperation
66 with member state systems.
67
68 **(3) Series of services (APIs)**
69
70 Public feedback explanatory note (chapter 5: Support measures) contains following:
71
72 **Member States will have access to a new version of the eNotices application, currently**
73 **under preparation by the Publications Office. The Publications Office will provide the**
74 **forms and a series of services (APIs) that 3rd parties can re-use and integrate in their**
75 **applications; this will make the development of their own applications faster and**
76 **easier.**
77
78 NOTE: I have advocated several times one European Union contact point (EUCP) for creating
79 different interfaces and/or application programming interfaces (API). One European Union contact
80 point (EUCP) could handle cooperation members state systems (MSS). Actually I have advocated
81 member state contact point (MSCP), which could handle cooperation with members state systems
82 (MSS).
83
84 **(4) Public feedback explanatory note (Chapter 4: Purpose) contains following:**
85
86 **Helping improve governance by making structured buyer and seller identifiers**

87   **mandatory and including a limited number of policy relevant fields (e.g. on green,**
88   **social, and innovative procurement).**
89
90   NOTE: I have noted several times different identifiers which are used in member states. There can
91   be buyer and seller identifiers in different member state systems.
92
93   **(5) Public feedback explanatory note (Chapter 6: Future updates) contains following:**
94
95   **In the future, after the adoption of this regulation, the Implementing Regulation on**
96   **standard forms should be amended more often than in the past (e.g. every one or two**
97   **years instead of every four). However, these changes should consist of minor**
98   **"bugfixing" changes, not major reforms. This more agile approach is appropriate for**
99   **an IT environment, which eForms are unavoidably part of, and will avoid the current**
100   **situation where problems often go unsolved for years. Such an approach also**
101   **corresponds well with the flexibility given by the advisory procedure, an**
102   **administratively light procedure, which is used for adopting the act.**
103
104   NOTE: I have noted several times that there can be different versions of different interfaces,
105   identifiers and standards.
106
107   NOTE: Proposed timetable for changes (e.g. interfaces, identifiers and standards) can mean usage
108   of several versions.
109
110   **(6) Public feedback explanatory note (Chapter 6: Future updates) contains following:**
111
112   **Besides allowing technical improvement to the standard forms, this responsive**
113   **approach to legislation will also allow Member States to innovate in the area of data**
114   **while respecting the Directives' provision that "Notices published at national level shall**
115   **not contain information other than that contained in the notices dispatched to the**
116   **Publications Office of the European Union." Specifically, Member States will be able to**
117   **add fields at national level, because these will then be added (as optional) also at the**
118   **EU level. Thus, equal treatment for companies will be ensured while Member States**
119   **will be able to innovate for the sake of competition and transparency.**
120
121   NOTE: Based on some consultations I have noted need different free-form fields (concepts) for
122   different information systems.
123
124   **Opinion: Proposed solution for adding optional fields (concepts) can be supported.**
125
126
127
128   [Continues on the next page]
129

130
131   **PART 2: Some comments based on previous mentioned issues**
132
133   Even though feedback explanatory note contains issues, which can be supported, I present some
134   issues to be consider after this consultation:
135
136   **(A) EU wide procurement procedure identifier**
137
138   **About different identifiers (ID)**
139
140   Developing a standardised member state contact point (MSCP) means some work to be done. Here
141   we can note that there will be several ***identifiers*** when developing new systems and maintaining
142   current systems (EUCP ↔ MSCP).
143
144   I have proposed several times to use ***open and public identifiers*** when developing different
145   information system.
146
147   **More and more new identifiers (ID)**
148
149   In previous consultations there has been discussion about different identifiers (ID) in different
150   information systems. It can be noted from the previous opinions that there will be several and
151   different identifiers (ID) for different levels.
152
153   Examples of these identifiers (ID) are following:
154
155   1) Facebook ID for an individual person
156   2) Facebook ID for the individual updates of individuals
157   3) Data Universal Numbering System (D-U-N-S)
158   4) Reuters instruments codes (RICs)
159   5) Social security code for individual citizens in the European Union member states
160   6) Business identity code for a company in an European Union member state
161   7) Value added tax code for a company in an European Union member state.
162
163   The examples of private identifiers (Facebook IDs, Data Universal Numbering System (D-U-N-S),
164   Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
165   of using identifiers (ID) from privately owned information systems.
166
167   **Proposal: There could be a systematic review of different identifiers (ID) at different**
168   **levels.**
169
170   **Proposal: Possible systematic review of different identifiers (ID) should assess different**
171   **situations.**
172
173   Different information systems have also internal identifiers (ID) and external identifiers (ID) for
174   (possible) public usage. The added value for different stakeholders is provided by combination of

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175 different identifiers (ID) in a specific information system.
176
177   **Proposal: The could be some assessment(s) based on different versions of different**
178   **identifiers (ID).**
179
180 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
181 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
182 (ID), but this consolidation means some serious technical and administrative actions.
183
184   **Proposal: Legacy identifiers (ID) could be assessed seriously.**
185
186 When information about relevant identifiers is collected, there could be a serious assessment of
187 possible (near) monopoly situation of some identifiers. Depending on the nature of an identifier,
188 there may be a need for serious (anti-trust?) negotiations with providers of some identifiers.
189
190   **Proposal: The nature of different identifiers (ID) could be assessed.**
191
192   **Proposal: There could be serious negotiations with some providers of identifiers (ID).**
193
194 In the European Union there has been different anti-trust cases which are related to different private
195 sector identifiers (ID), since some of those private sector identifiers (ID) have been used in several
196 other systems. Some private sector identifiers (ID) can mean a (near) monopoly situation.
197
198   **Question: What this means to Commission Implementing Regulation establishing**
199   **standard forms for the publication of notices in the field of public procurement**
200   **("eForms")?**
201
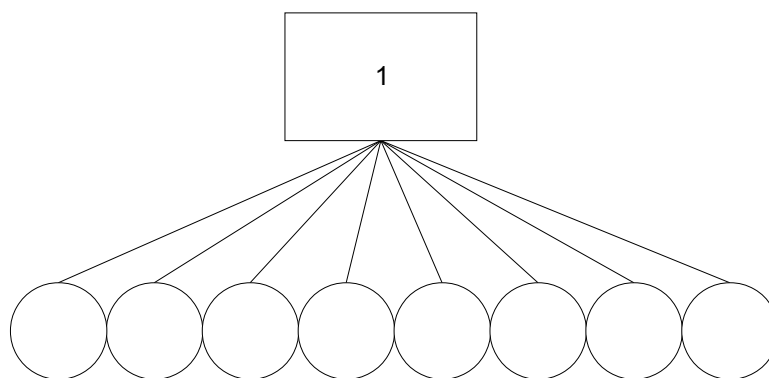
202
203
204   **Answer: This means that there can be several identifiers (ID) for different information**
205   **systems.**
206
207   **Proposal: Proposed systems have to support several identifier (ID) versions at the same**
208   **time.**
209

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210   **Answer: New information systems may be developed in the future and those new**
211   **information systems can use different identifiers (ID).**
212
213   **(B) Collaborative platform**
214
215   **Complexity at the European Union level**
216
217   I have noted several times that different member state systems (MSS) can interlinked in many ways.
218   This means that co-operation with European Union systems means a lot of work. This leads to the
219   question of a European Contact Point (EUCP) for different member state systems (MSS).
220
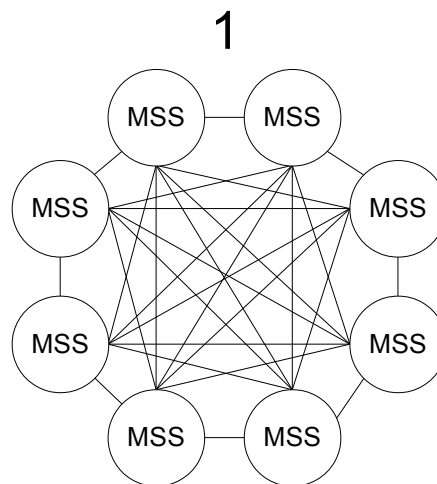
222   **MSS = Member State System**
223
224   There are 28 member states (European Union) at the moment. In reality there are unique situations
225   with information systems in different member states. In some cases information systems can be
226   implemented based on complex system-to-system connections. Complex system-to-system
227   connections means a lot of work when there are changes in some systems.
228
229   Here we can calculate connections based on number of information systems.
230
231   1 x 28 member state systems = 28 systems
232   5 x 28 member state systems = 140 systems
233   10 x 28 member state systems = 280 systems
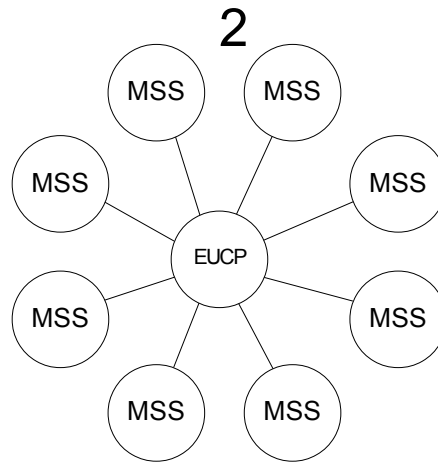234   15 x 28 member state systems = 420 systems
235   20 x 28 member state systems = 560 systems.
236   28 x 30 member state systems = 840 systems
237
238   **Proposal: Complex system-to-system connections implemented in information systems**
239   **could be assessed carefully.**

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2

240
241   **MSS = Member State System**
242   **EUCP = European Contact Point**
243

244   Naturally there could be direct contacts between different member state systems (MSS) and
245   European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
246   number of different member state system. Based on 28 member state systems there could be
247   hundreds of connections. One option is to have a single European contact point for member state
248   systems. Here we can note that there can be hierarchy between different system (EU ↔ member
249   states) and there can be member state contact points (MCP). Then there can be some hierarchy
250   between different systems. (European Union ↔ EUCP ↔ MSCP ↔ MSS ↔ Member State). There
251   are unique situations with member statesystems in member states. Therefore member state contact
252   points (MCP) can reduce the complexity with European Union contact point (EUCP).
253

3
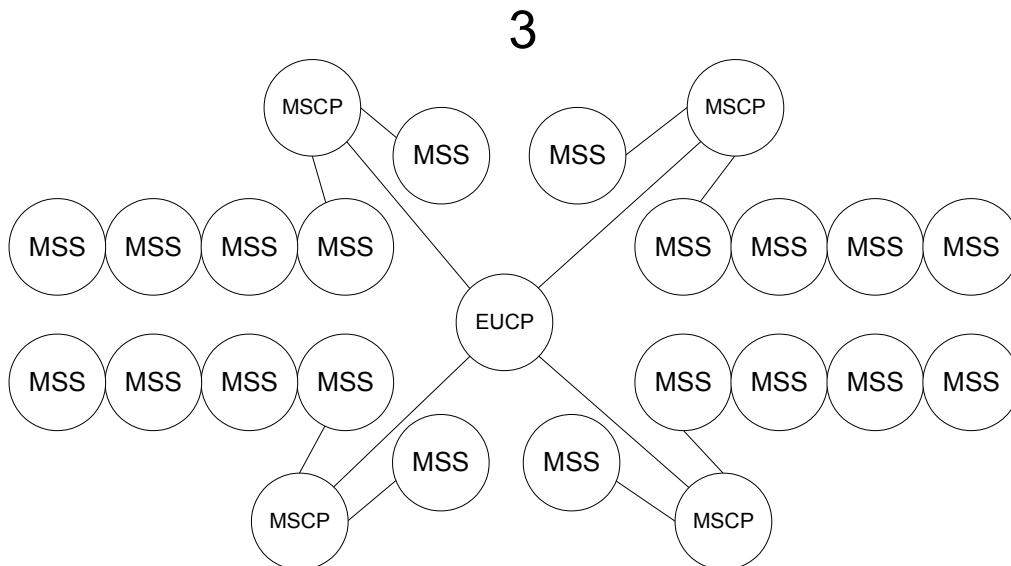
254
255   **MSS = Member State System, MSCP = Member State Contact Point,**
256   **EUCP = European Contact Point**

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257
258　Based on those calculations there could be a lot of direct connections to the European contact point.
259　Number of those connections can be overwhelming. The situation between member states can vary
260　in many ways. So there can different and unique systems between member states.
261
262　I have proposed several times creation of member state contact points which could handle different
263　system-to-system connections at member state level. Then it can be easier to create connections
264　between member state contact points and European contact point.
265

266　　　**Proposal: There could be one information system (member state contact point, MSCP)**
267　　　**at member state level.**
268
269　　　**Proposal: Different member state systems could be consolidated based on limited**
270　　　**number system-to-system connections (MSCP ↔ MSS).**
271
272　　　**Proposal: One information system (member state contact point, MSCP) at member**
273　　　**state level could handle system-to-system connections at the European Union level**
274　　　**(European contact point) (EUCP↔ MSCP).**
275
276　　　**Proposal: There could be some serious work for developing a standardised member**
277　　　**state contact points (MSCP).**
278
279　　　**Proposal: After developing a standardised member state contact point (MSCP)**
280　　　**different member states could consolidate their systems (MSCP ↔ MSS).**
281
282　　　**Proposal: European Union contact point (EUCP) and member state contact points**
283　　　**(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) at the European**
284　　　**Union level.**
285
286　Naturally we have to note that developing a standardised member state contact point (MSCP) means
287　more work. On the other hand a standardised member state contact point (MSCP) could handle
288　cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
289　states may have more systems than other member states. We have to note that there are different
290　systems based on several technological solutions.
291
292　**Question: What this means to Commission Implementing Regulation establishing standard**
293　**forms for the publication of notices in the field of public procurement ("eForms")?**
294
295　　　**Answer: Consolidation of different (EUCP ↔ MSCP ↔ MSS) information systems can**
296　　　**mean work for several years.**
297
298　　　**Answer: Different Member State Systems (MSS) have their own life-cycles.**
299
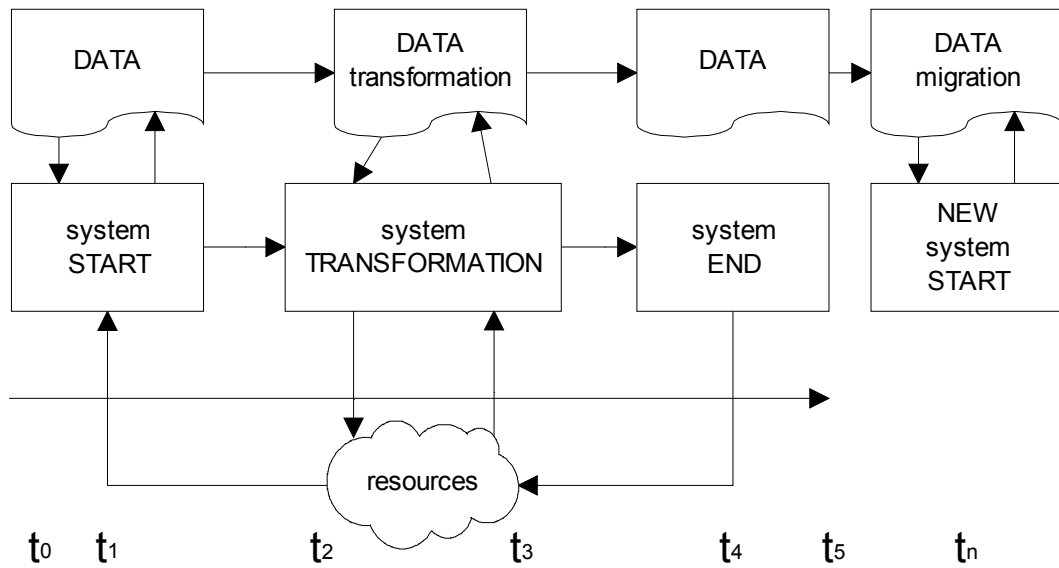
300
301
302   **Answer: Proposed cooperation between (EUCP ↔ MSCP ↔ MSS) different systems**
303   **have different problems based on life-cycles of systems.**
304   **Answer: The European Commission and member states can agree on changes for**
305   **different systems based on life-cycles of different systems.**
306
307   **(C) Series of services (APIs)**
308

309

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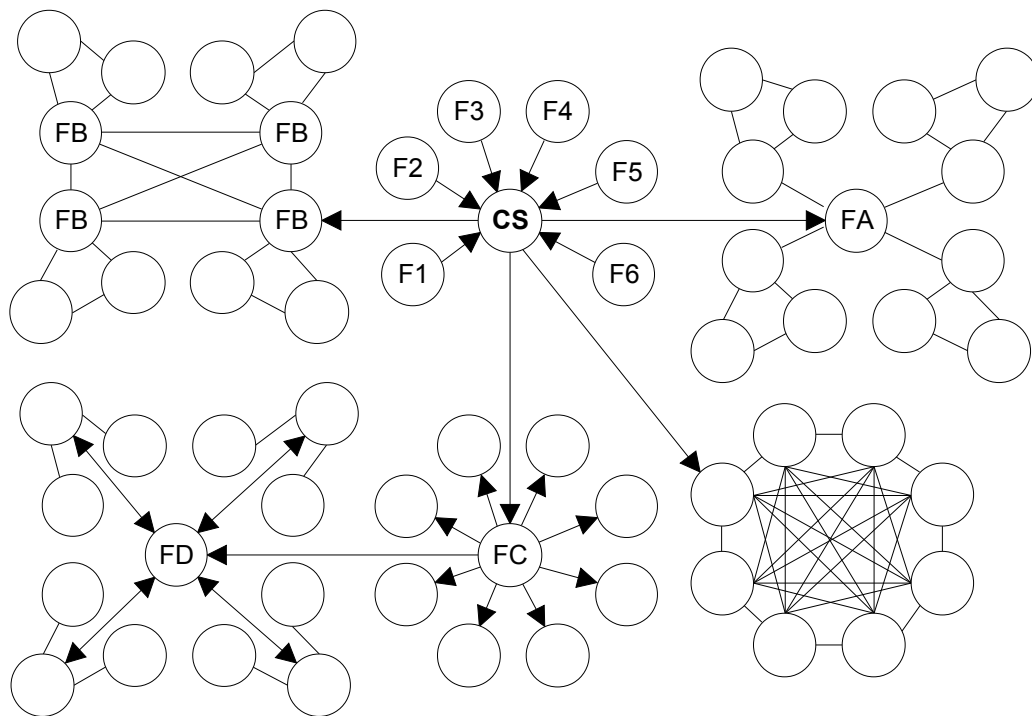
310
311   Previously there has been discussion about different identifiers (ID). Public feedback explanatory
312   note notices different application programming interfaces. Here can be repeated that there can be
313   several identifiers (ID) and different application programming interfaces (API).
314
315   There can be several layers of identifiers (ID) and application programming interfaces (API).
316   Identifiers (ID) and application programming interfaces (API) can also implement different
317   standards.
318
319   **Question: What this means to Commission Implementing Regulation establishing standard**
320   **forms for the publication of notices in the field of public procurement ("eForms")?**
321
322   **Answer: There can be some new standards for identifiers (ID) and application**
323   **programming interfaces (API) in the future.**
324
325   **Answer: Assessing different layers of identifiers (ID) and application programming**
326   **interfaces (API) can mean some new development work (EUCP ↔ MSCP ↔ MSS).**
327
328   **Answer: Like mentioned before there can be different versions for identifiers (ID) and**
329   **application programming interfaces (API).**
330
331   **Answer: In some cases (EUCP ↔ MSCP ↔ MSS) there can identifiers (ID) and**
332   **application programming interfaces (API) which are not develop by European**
333   **Commission or member states.**
334
335   NOTE: In some cases Directorate-General for Competition (European Commission) has assessed
336   different identifiers (ID). In some cases some identifiers (ID) may cause monopoly situation.
337
338   **(D) Adding optional fields (concepts)**
339
340   **Answer: Adding optional fields (concepts) can be supported even though there are**
341   **already a lot of proposed fields – i.e. standard forms for the publication of notices in**
342   **the field of public procurement.**
343
344   **Answer: It is always possible to have new fields (concepts).**
345
346   **(E) About different standards for assessing publication of notices in the field of public**
347   **procurement**
348
349   **About different standards**
350
351   I have proposed several times usage of **_open horizontal standards_** when developing different
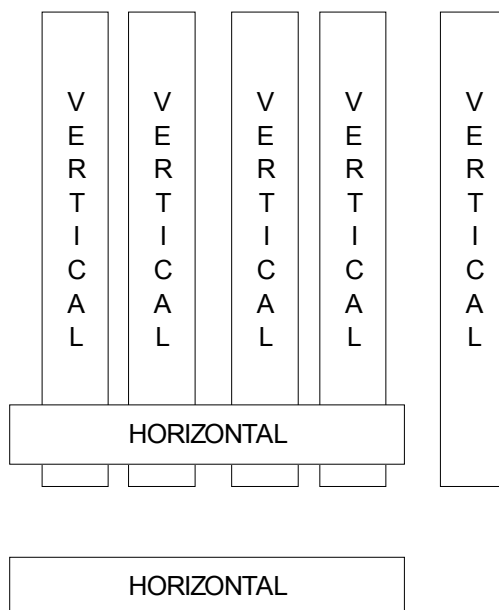352   information systems.
353
354   **Favouring open standards / Favouring horizontal standards**

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355
356 There are differences between horizontal and vertical standards. A simple example is naturally
357 email solutions. There are several vertical standards when creating technically email solutions. Then
358 there are horizontal standards which enable sending messages between technically different email
359 solutions.
360

```
┌─────┐ ┌─────┐ ┌─────┐ ┌─────┐   ┌─────┐
│  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  │
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│  L  │ │  L  │ │  L  │ │  L  │   │  L  │
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│  ┌──┴─┴─────┴─┴─────┴─┴──┐  │   │     │
│  │      HORIZONTAL       │  │   │     │
└──┴──────────────────────┴──┘   └─────┘

      ┌──────────────────────┐
      │      HORIZONTAL       │
      └──────────────────────┘
```

361
362
363   **Proposal: There could be assessment of vertical and horizontal standards.**
364
365   **Proposal: Using horizontal standards could be favoured when creating different**
366   **information systems at the European Union level.**
367
368 Horizontal standards enables technological solutions which can work together. Horizontal standards
369 hides different complexities in information systems.
370
371   **Opinion: The number of redundant standardisation efforts should be minimal.**
372
373   **Proposal: There could be separation of horizontal standards and vertical standards.**
374
375   **Proposal: There could be different standardisation efforts to horizontal standards and**
376   **vertical standards**
377
378 Personally I have advocated using different open horizontal standards. For example email standards
379 (horizontal) are implemented with very different technologies (vertical).
380
381 Here we can note that different national details can be vertical standards.
382

383   **Proposal: Different (vertical) national details (standards) should not hinder usage of**
384   **(European) other standards (horizontal).**
385
386   Here we can note some problems:
387
388   •   some systems are based on **de-facto** standards
389   •   some systems are based on **de-jure** standards
390   •   there can be confrontations between **de-facto** and **de-jure** standards
391   •   there can be a monopoly situation in some domain
392   •   some standards may inhibit possible actions of some stakeholders
393   •   there can be a standard war on some domains
394   •   standards have different life-cycles
395   •   systems have different life-cycles
396   •   there can be mismatches between different life-cycles
397   •   there can be failed standards
398   •   there can be deprecated standards.
399
400   It is quite normal situation in the information technology field that there are competing standards
401   for some application field. Therefore there are all the time ongoing "standards wars" or "format
402   wars". The information technology standards tend to be interrelated and one "standards war" or
403   "format war" can lead to another similar situation.
404
405   I have advocated open standards even though in some cases open standards are not de facto
406   standards. In practice public sector has very important role, when some standards are competing in
407   the market place. Because public sector has a considerable power when buying/developing
408   information systems and therefore public sector can sometimes direct markets to certain standards.
409   Therefore there should be serious vigilance when assessing different standards and "standards" in
410   some application fields.
411
412   There are different standards setting organisations on the information technology field. One list [1] of
413   these standards setting organisations is provided by ConsortiumInfo.org.
414
415   One warning can be said about standards setting organisations. All standards setting organisations
416   are not successes based on several factors and there can may irrelevant standards setting
417   organisations. Market situation on different vehicle markets varies a lot based on different factors.
418
419   **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**
420   **different standard setting organisations could be assessed carefully.**
421
422   Personally I have advocated using different horizontal standards. For example email standards
423   (horizontal) are implemented with very different technologies (vertical).
424
425   **Proposal: Governments should especially concentrate on horizontal standards.**
426

---

1   Standard Setting Organizations and Standards List, www.consortiuminfo.org/links/linksall.php

427 **Proposal: Some government agencies could apply for memberships of different**
428 **standard setting organisations which develop especially horizontal standards.**
429
430 **Proposal: Government agencies should not be passive by-standers when different**
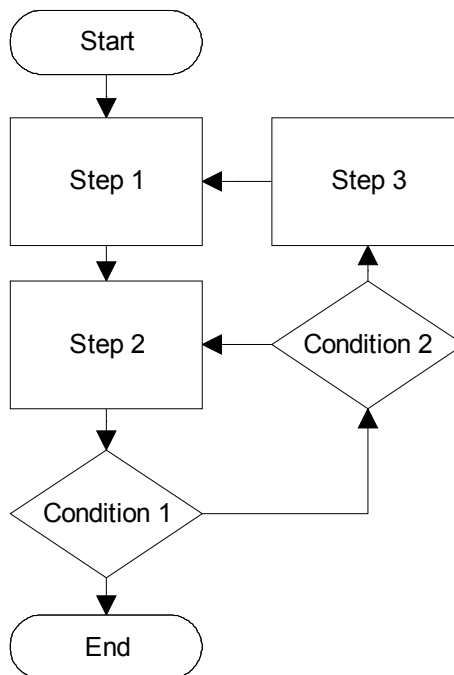431 **horizontal standards are developed.**
432
433 **Proposal: Government agencies could financially support development of horizontal**
434 **standards.**
435
436 **Proposal: There could some guidance for using open horizontal standards on different**
437 **application fields.**
438
439 **(F) Modelling different processes**
440

```
                         ┌──────────┐
                         │  Start   │
                         └────┬─────┘
                              ▼
        ┌──────────┐     ┌──────────┐
        │  Step 1  │◄────│  Step 3  │
        └────┬─────┘     └────▲─────┘
             ▼                │
        ┌──────────┐      ◇ Condition 2
        │  Step 2  │◄─────────┤
        └────┬─────┘          ▲
             ▼                │
         ◇ Condition 1 ───────┘
             ▼
        ┌──────────┐
        │   End    │
        └──────────┘
```

441
442
443 Here can be noted that procurement processes can vary when doing procurement.
444
445 **Opinion: Concept definitions are very good based on the annex for main**
446 **consultation document.**
447
448 However, there is not too much considerations about different process models for procurement.
449 Since concepts are well revised and presented it is possible to create good process models for
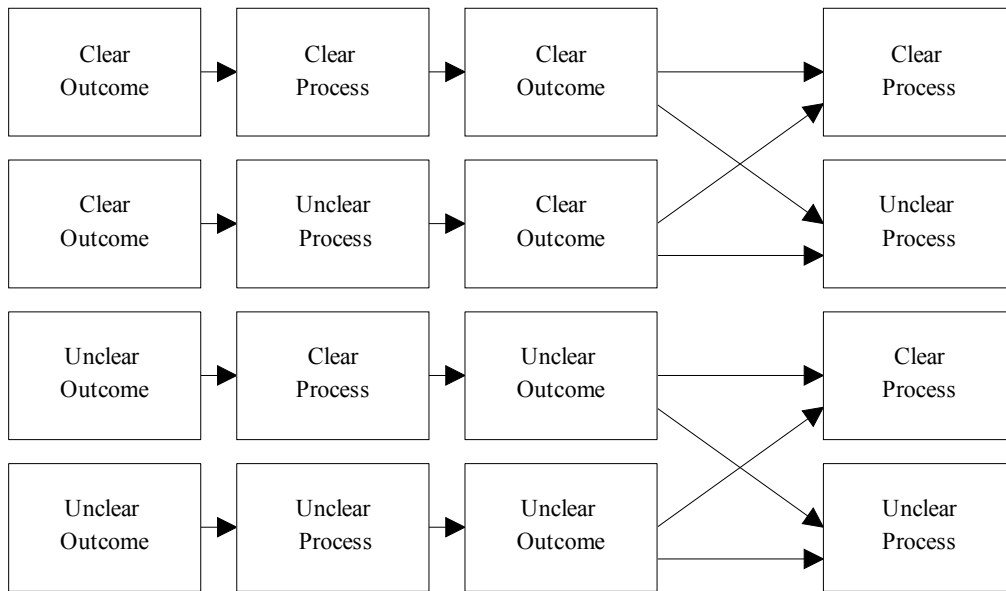450 procurement.
451
452 **Proposal: Different procurement process models could be presented – for example as**
453 **flowcharts (previous figure).**

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454   **Proposal: Processes with external stakeholders could be modelled.**
455
456   **Proposal: There could be possibilities for describing and modelling different process**
457   **models for procurement.**
458

Clear Outcome	Clear Process	Clear Outcome	Clear Process
Clear Outcome	Unclear Process	Clear Outcome	Unclear Process
Unclear Outcome	Clear Process	Unclear Outcome	Clear Process
Unclear Outcome	Unclear Process	Unclear Outcome	Unclear Process

459
460
461 Problems naturally arise since processes and outcomes can clear or unclear. Naturally it is easier to
462 model processes when processes and outcomes are very clear.
463
464   **Proposal: There could be well-revised process models which could be used when**
465   **procuring something.**
466

LIFETIME

START   PROCESS   END

| event | state | event | state | event | state | event |

| instance | instance | instance | instance | instance | instance | instance |

467
468

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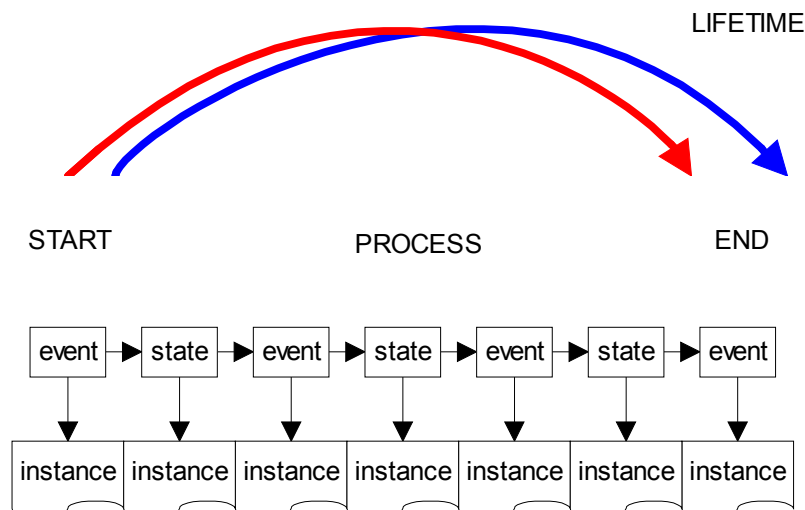
469
470 Here can noted that different processes have their lifetime and during lifetime there are several
471 events and states. It is possible to document every instance of events and states. Documentation
472 (events and states) can mean traditional documents and/or electronic systems.
473
474 **(G) Cooperation between systems – direct connections or transmitting documents?**
475
476 Here we can note following basic functions of different information systems:
477
478 •   add data
479 •   retrieve data
480 •   change data
481 •   remove data
482 •   administration of an information system
483 •   data as documents
484 •   direct connections between systems
485 •   displays and interfaces
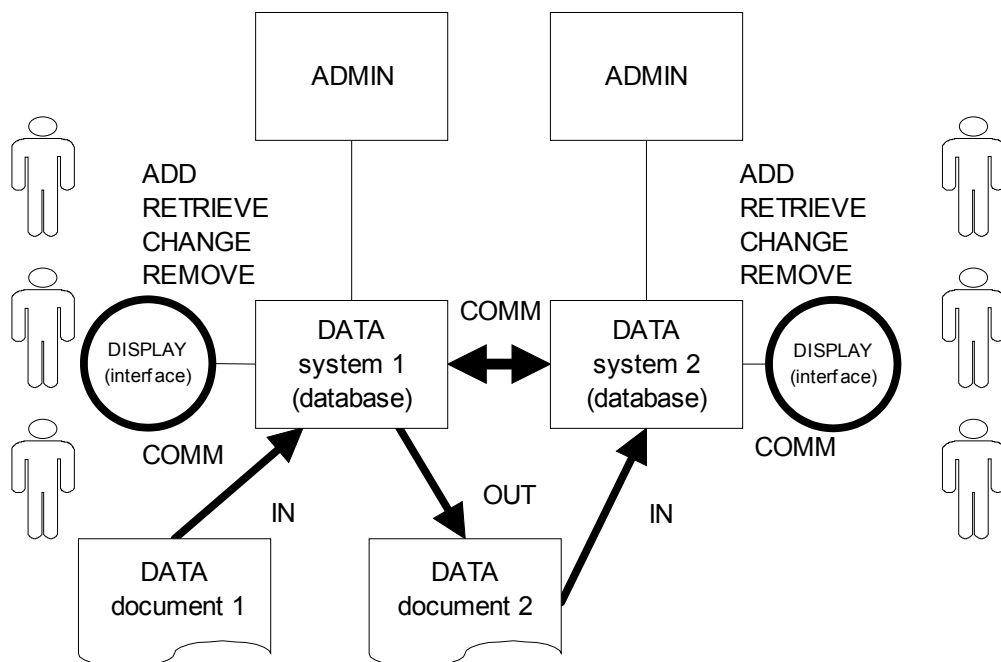486 •   communication between systems.
487
488 **Proposal: Direct connections between systems should be assessed carefully.**
489
490 **Proposal: Connections between systems based on documents should be assessed**
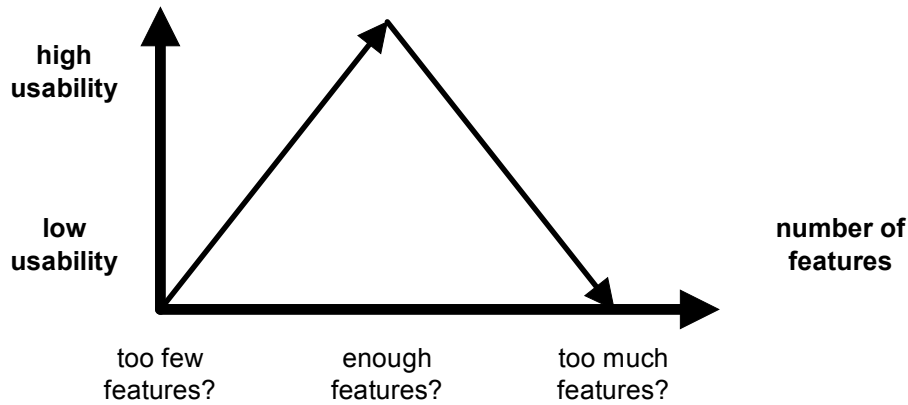491 **carefully.**
492

493
494
495 **(H) Number of different features for procurement systems**

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496
497
498   Here can noted number of different features when using some information system.
499
500   **Proposal: Number of different features for different systems should be assessed**
501   **carefully.**
502
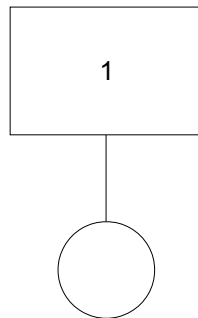
503
504
505   Here we can note different approaches for developing information systems. Some stakeholders
506   propose one well-done interface for all users of some information system. Some stakeholders
507   propose several smaller well-done interface for different users of some information system.
508
509   **Proposal: Number of different interfaces should be assessed carefully.**
510
511   **Proposal: Number of features for different interfaces should be assessed carefully.**
512
513   **Opinion: One big interface with large number of features is not the best possible**
514   **way for creating information systems.**
515
516   **Proposal: There could be several interfaces based on needs of different stakeholders.**
517
518   **(I) Developing technical regulations for procurement systems**
519

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┌──────────────┐         ┌──────────────┐         ┌──────────────┐
│  Technical   │────────▶│  Committee   │◀────────│Other feedback│
│  problem     │         │  phase 1     │         │              │
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                                │
                                ▼
                         ┌──────────────┐
                         │  Document    │
                         │  phase 1     │
                         └──────┬───────┘
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                         ┌──────────────┐                         ┌──────────────┐
                         │  IT experts  │◀────────(  )◀───────────│  National    │
                         │  round 1     │                         │  IT expert   │
                         └──────┬───────┘                         │association(s)│
                                │                                 └──────────────┘
                                ▼
                         ┌──────────────┐
                         │  Committee   │
                         │  phase 2     │
                         └──────┬───────┘
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                         ┌──────────────┐
                         │  Document    │
                         │  phase 2     │
                         └──────┬───────┘
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                         ┌──────────────┐                         ┌──────────────┐
                         │  IT experts  │◀────────(  )◀───────────│  National    │
                         │  round 2     │                         │  IT expert   │
                         └──────┬───────┘                         │association(s)│
                                │                                 └──────────────┘
                                ▼
                         ┌──────────────┐
                         │  Committee   │
                         │  DECISION    │
                         └──────┬───────┘
                                │
                                ▼
                         ┌──────────────┐
                         │  Technical   │
                         │  Regulation  │
                         └──────────────┘
```
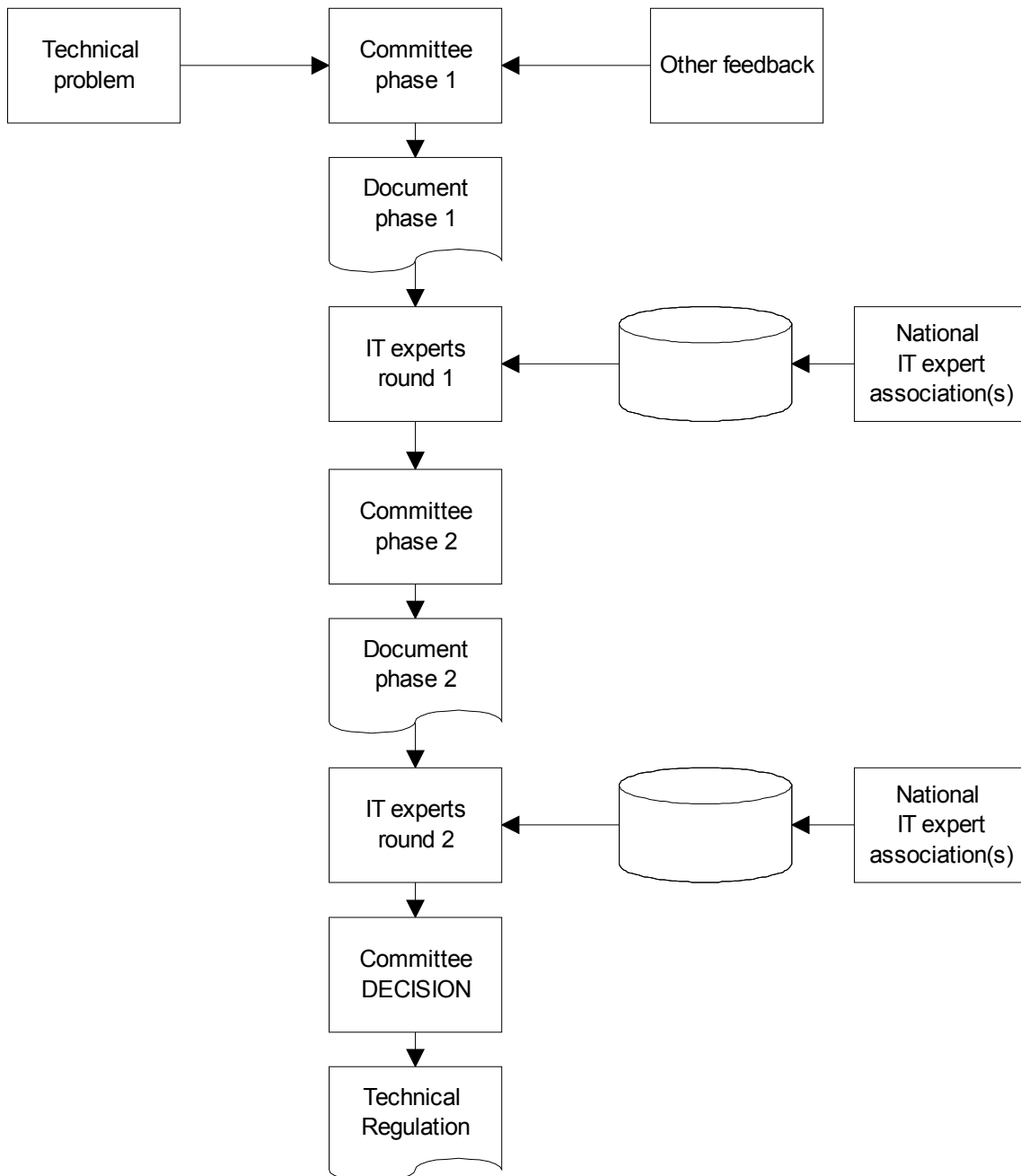
520
521
522 Previously I have advocated development of open solutions (e.g. open standards) to be used in
523 different phases for procurement processes. Like mentioned before there are several issues to be
524 considered when developing different systems.
525
526   **Proposal: There could be a process model for developing technical regulations.**
527
528   **Proposal: Different consultations about technical issues could be transmitted to**

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529   **different (national?) information technology expert associations.**
530
531   **Proposal: There should be a clear process for developing and assessing technical**
532   **regulations – e.g. two phases for assessing technical issues.**
533
534   **(J) Other issues**
535
536   **An example for cooperation: Web feeds (RSS and Atom)**
537

538
539
540   I have advocated usage of web feeds [2] on several previous opinion documents. Actually there are
541   two standards for web feeds: RSS [3] [4] and Atom [5] [6] [7].
542
543   **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
544   **informations systems (EU / Member states).**
545
546   **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
547   **time) information for different stakeholder(s) (communities).**
548
549   **Proposal: There can be different web feeds (RSS and/or Atom) for different**
550   **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
551   **solution.**
552
553   **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
554
555   It can be easier to create web feeds in different information systems since web feeds enable
556   connections without direct system-to-system connections.
557
558   It can be noted, that different back-office systems (with a wide variety of different technologies) can
559   implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
560   kind solutions front-office systems don´t need direct system-to-system communications with back-
561   office systems.
562

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2   https://en.wikipedia.org/wiki/Web_feed
3   http://www.rssboard.org/rss-specification, RSS 2.0 Specification
4   https://en.wikipedia.org/wiki/RSS, Wikipedia / RSS
5   https://en.wikipedia.org/wiki/Atom_(standard), Wikipedia / Atom (standard)
6   https://tools.ietf.org/html/rfc4287, The Atom Syndication Format
7   https://tools.ietf.org/html/rfc5023, The Atom Publishing Protocol

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563
564
565   **ANNEX 1**
566
567   My opinions to the previous and relevant consultations – there consultations were mostly organised
568   by the European Commission. General page to all consultations – both in English and in Finnish:
569   http://www.jukkarannila.fi/lausunnot.html
570
571
572   My opinions to the previous and relevant consultations – there consultations were mostly organised
573   by the European Commission.
574
575   EN: Opinion 1: Review of the rules on access to documents
576   http://www.jukkarannila.fi/lausunnot.html#nro_1
577
578   EN: Opinion 2: Schools for the 21st Century
579   http://www.jukkarannila.fi/lausunnot.html#nro_2
580
581   EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
582   Safe and Innovative medicines
583   http://www.jukkarannila.fi/lausunnot.html#nro_3
584
585   EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
586   http://www.jukkarannila.fi/lausunnot.html#nro_5
587
588   EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
589   http://www.jukkarannila.fi/lausunnot.html#nro_6
590
591   EN: Opinion 8: European Interoperability Framework, version 2, draft
592   http://www.jukkarannila.fi/lausunnot.html#nro_8
593
594   EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
595   proposal for comments
596   http://www.jukkarannila.fi/lausunnot.html#nro_9
597
598   EN: Opinion 15: Collective Redress
599   http://www.jukkarannila.fi/lausunnot.html#nro_15
600
601   EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
602   http://www.jukkarannila.fi/lausunnot.html#nro_17
603
604   EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
605   http://www.jukkarannila.fi/lausunnot.html#nro_18
606
607

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608   EN: Opinion 19: Official Acknowledgement by the Commission
609   http://www.jukkarannila.fi/lausunnot.html#nro_19
610
611   EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
612   http://www.jukkarannila.fi/lausunnot.html#nro_20
613
614   EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
615   http://www.jukkarannila.fi/lausunnot.html#nro_21
616
617   EN: Opinion 23: Public consultation on the review of the European Standardisation System
618   http://www.jukkarannila.fi/lausunnot.html#nro_23
619
620   EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
621   http://www.jukkarannila.fi/lausunnot.html#nro_27
622
623   EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
624   http://www.jukkarannila.fi/lausunnot.html#nro_28
625
626   EN: Opinion 30: Internet Filtering
627   http://www.jukkarannila.fi/lausunnot.html#nro_30
628   NOTE: Organised by the European Committee for Standardization (CEN) [8]
629
630   EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
631   http://www.jukkarannila.fi/lausunnot.html#nro_32
632
633   EN: Opinion 34: REMIT Registration Format
634   http://www.jukkarannila.fi/lausunnot.html#nro_34
635   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [9]
636
637   EN: Opinion 35: Exploiting the employment potential of the personal and household services
638   http://www.jukkarannila.fi/lausunnot.html#nro_35
639
640   EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
641   http://www.jukkarannila.fi/lausunnot.html#nro_37
642
643   EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
644   http://www.jukkarannila.fi/lausunnot.html#nro_39
645
646   EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
647   http://www.jukkarannila.fi/lausunnot.html#nro_40
648
649   EN: Opinion 41: AT.39398: observations on the proposed commitments
650   http://www.jukkarannila.fi/lausunnot.html#nro_41

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

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652   EN: Opinion 42: Opening up Education
653   http://www.jukkarannila.fi/lausunnot.html#nro_42
654

655   EN: Opinion 43: Publication of extracts of the European register of market participants
656   http://www.jukkarannila.fi/lausunnot.html#nro_43
657   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
658

659   EN: Opinion 44: Evaluation policy guidelines
660   http://www.jukkarannila.fi/lausunnot.html#nro_44
661

662   EN: Opinion 45: About ICT standardisation
663   http://www.jukkarannila.fi/lausunnot.html#nro_45
664

665   EN: Opinion 46: Review of the EU copyright rules
666   http://www.jukkarannila.fi/lausunnot.html#nro_46
667

668   EN: Opinion 51: European Area of Skills and Qualifications
669   http://www.jukkarannila.fi/lausunnot.html#nro_51
670

671   EN: Opinion 52: Trusted Cloud Europe Survey
672   http://www.jukkarannila.fi/lausunnot.html#nro_52
673

674   EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
675   http://www.jukkarannila.fi/lausunnot.html#nro_53
676   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
677

678   EN: Opinion 55: European Energy Regulation
679   http://www.jukkarannila.fi/lausunnot.html#nro_55
680   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
681

682   EN: Opinion 59: Green paper on mobile Health
683   http://www.jukkarannila.fi/lausunnot.html#nro_59
684

685   EN: Opinion 60: Cross-border inheritance tax problems within the EU
686   http://www.jukkarannila.fi/lausunnot.html#nro_60
687

688   EN: Opinion 61: European Register of Products Containing Nanomaterials
689   http://www.jukkarannila.fi/lausunnot.html#nro_61
690

691   EN: Opinion 64: Corporate Social Responsibility - European Commission
692   http://www.jukkarannila.fi/lausunnot.html#nro_64
693

694   EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
695   http://www.jukkarannila.fi/lausunnot.html#nro_66

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696
697 EN: Opinion 68: European Network Code Stakeholder Committees
698 http://www.jukkarannila.fi/lausunnot.html#nro_68
699 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
700
701 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
702 http://www.jukkarannila.fi/lausunnot.html#nro_71
703 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
704
705 EN: Opinion 74: Enabling the Internet of Things
706 http://www.jukkarannila.fi/lausunnot.html#nro_74
707 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) [10]
708
709 EN: Opinion 80: Mandatory Transparency Register
710 http://www.jukkarannila.fi/lausunnot.html#nro_80
711
712 EN: Opinion 84: Revision of the European Interoperability Framework
713 http://www.jukkarannila.fi/lausunnot.html#nro_84
714
715 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
716 http://www.jukkarannila.fi/lausunnot.html#nro_86
717
718 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
719 http://www.jukkarannila.fi/lausunnot.html#nro_88
720
721 EN: Opinion 89: BEREC Guidelines for net neutrality rules
722 http://www.jukkarannila.fi/lausunnot.html#nro_89
723 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
724
725 EN: Opinion 93: Safety of apps and other non-embedded software
726 http://www.jukkarannila.fi/lausunnot.html#nro_93
727
728 EN: Opinion 95: Targeted consultation on eForms
729 http://www.jukkarannila.fi/lausunnot.html#nro_95
730
731 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
732 http://www.jukkarannila.fi/lausunnot.html#nro_97
733
734 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
735 http://www.jukkarannila.fi/lausunnot.html#nro_98
736
737 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
738 Regulators. Recast
739 http://www.jukkarannila.fi/lausunnot.html#nro_99

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

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740
741 EN: Opinion 100: Protection of personal data (EU)
742 http://www.jukkarannila.fi/lausunnot.html#nro_100
743
744 EN: Opinion 101: Governance of the Energy Union
745 http://www.jukkarannila.fi/lausunnot.html#nro_101
746
747 EN: Opinion 102: Smart Wearables
748 http://www.jukkarannila.fi/lausunnot.html#nro_102
749
750 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
751 (ENISA)
752 http://www.jukkarannila.fi/lausunnot.html#nro_106
753
754 EN: Opinion 108: Single Digital Gateway
755 http://www.jukkarannila.fi/lausunnot.html#nro_108
756
757 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
758 http://www.jukkarannila.fi/lausunnot.html#nro_110
759
760 EN: Opinion 111: Interoperability of information systems for migration and security
761 http://www.jukkarannila.fi/lausunnot.html#nro_111
762
763 EN: Opinion 113: Transform of health and care
764 http://www.jukkarannila.fi/lausunnot.html#nro_113
765
766 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
767 Internet
768 http://www.jukkarannila.fi/lausunnot.html#nro_114
769 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
770
771 EN: Opinion 118: Fake news and online disinformation
772 http://www.jukkarannila.fi/lausunnot.html#nro_118
773
774 EN: Opinion 119: European Social Security Number
775 http://www.jukkarannila.fi/lausunnot.html#nro_119
776
777 EN: Opinion 120: European Labour Authority
778 http://www.jukkarannila.fi/lausunnot.html#nro_120
779
780 EN: Opinion 121: 2nd Data Package
781 http://www.jukkarannila.fi/lausunnot.html#nro_121
782
783
784

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785
786   EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
787   Cybersecurity Research and Competence Centre
788   http://www.jukkarannila.fi/lausunnot.html#nro_122
789
790   EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
791   THE COUNCIL on the re-use of public sector information (recast)
792   http://www.jukkarannila.fi/lausunnot.html#nro_123
793
794   EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
795   http://www.jukkarannila.fi/lausunnot.html#nro_125
796
797   EN: Opinion 128: Summertime arrangements
798   http://www.jukkarannila.fi/lausunnot.html#nro_128
799
800   EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
801   http://www.jukkarannila.fi/lausunnot.html#nro_129
802
803   EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
804   http://www.jukkarannila.fi/lausunnot.html#nro_132
805
806
807
808
809   My opinions to the previous and relevant consultations – there consultations were mostly organised
810   by the European Commission. General page to all consultations – both in English and in Finnish:
811   http://www.jukkarannila.fi/lausunnot.html
812
813
814   [Continues on the next page]
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817
818   **ANNEX 2**
819   DISCLAIMERS
820
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862