1
2   **TO: European Commission**
3
4
5   **Document reference: Ref. Ares(2019)1575962 - 08/03/2019**
6
7   First of all, a lot of thanks to European Commission for organising this important consultation.
8
9   This opinion represents an opinion of an individual citizen, not any legal entity.
10
11 This opinion does not contain:
12   –   any business secrets
13   –   any trade secrets
14   –   any confidential information.
15
16 This opinion is public.
17 PDF file of this opinion can be added to a relevant web page.
18
19 Annex 1 holds information about previous consultations at the European Union level.
20 Annex 2 holds information about disclaimers and copyright.
21
22
23
24 Best Regards,
25
26
27
28 Jukka S. Rannila
29 citizen of Finland
30
31 signed electronically
32
33
34 [Continues on the next page]
35

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Jukka S. Rannila

OPINION

2 (19)

www.jukkarannila.fi

6 April 2019

Public / WWW

36
37 **About previous consultations / Repeating several issues**
38
39 Annex 1 holds info about previous consultations. I have repeated the same issues several times and
40 previous consultation documents can be assessed critically. Different units of the European
41 Commission already know something about my previous opinions.
42
43 **More and more identifiers (ID)**
44
45 In the previous consultations there has been discussion about different identifiers (ID) in the
46 different systems. It can be noted from the previous opinions, that there will be several and different
47 identifiers (ID) for different levels. On the European Union level there can be several identifiers
48 (ID), e.g. following:
49
50   * global identifiers (ID)
51   * EU-wide identifiers (ID)
52   * general member state identifiers (ID)
53   * several identifiers (ID) in member states.
54
55   **Proposal: There could be a systematic review of different identifiers (ID).**
56
57 It can be noted, that some member states (EU) are federations, and different federal states can have
58 their own identifiers (ID).
59
60 Examples of these identifiers are following:
61
62   1) Facebook ID for an individual person
63   2) Facebook ID for the individual up-dates of individuals
64   3) Data Universal Numbering System (D-U-N-S)
65   4) Reuters instruments codes (RICs)
66   5) Social security code for individual citizens in the European Union member states
67   6) Business identity code for a company in an European Union member state
68   7) Value added tax code for a company in an European Union member state.
69
70 The examples of private IDs (Facebook IDs, Data Universal Numbering System (D-U-N-S),
71 Reuters Instrumens Codes (RICs)) show, that persons and/or communities can use or even demand
72 of using IDs from privately owned information systems.
73
74 **More new identifiers (ID)?**
75
76 The current reality is, that there will be more and more IDs, since digitalisation of different areas
77 will result new IDs and/or combination of new and old IDs.
78
79 The creation YET another public ID is not always organised by the European Union, and in some
80 cases the European Union (and member states) just have to accept the reality of some of those

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81 public IDs – in some cases even private IDs are the norm. The Reuters Instrumens Codes (RICs) is
82 an example of a near monopoly situation, and some of current private IDs might constitute (near)
83 monopoly situations. Naturally, (near) monopolies can be assessed by the Competition Directorate-
84 General, and it will be interesting to see possible new cases related to private IDs.
85
86 **EU-wide level?**
87
88 I have noted several times that different member state systems (MSS) can interlinked in many ways.
89 This means that co-operation with European Union systems means a lot of work. This leads to the
90 question of a European Contact Point (EUCP) for different member state systems (MSS).
91
92 Naturally there could be direct contacts between different member state systems (MSS) and
93 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
94 number of different member state system. Based on 28 member state systems there could be
95 hundreds of connections:
96
97   28 x 10 = 280 MSS ↔ 1 EUCP
98   28 x 20 = 560 MSS ↔ 1 EUCP
99   28 x 30 = 840 MSS ↔ 1 EUCP
100
101 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
102 there can be member state contact points (MCP). Then there can be some hierarchy between
103 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
104 with member state systems in member states. Therefore member state contact points (MCP) can
105 reduce the complexity with European Union contact point (EUCP)
106
107 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
108 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
109
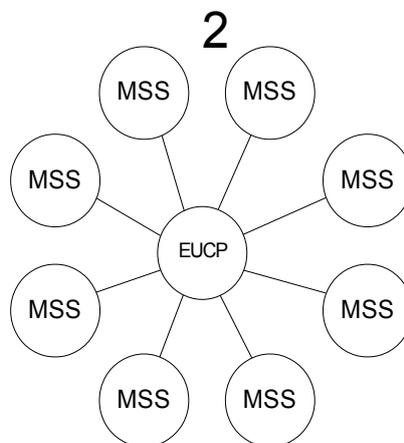
111   **MSS = Member State System, EUCP = European Contact Point**
112

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113 In the current situation, European Union member states (and some co-operation states) have their
114 own internal IDs for several information systems. Also, the members states organised as a
115 federation have their own internal problems with state-level IDs.
116
117 Based on those calculations there could be a lot of direct connections to the European contact point.
118 Number of those connections can be overwhelming. The situation between member states can vary
119 in many ways. So there can different and unique systems between member states.
120
121 On the other hand, there are some working examples of joined or federated EU-wide registers.
122 However, the amount of administration and needed legally binding agreements is considerable.
123
124 **Proposal : There could be one information system (member state contact point, MSCP)**
125 **on member state level.**
126

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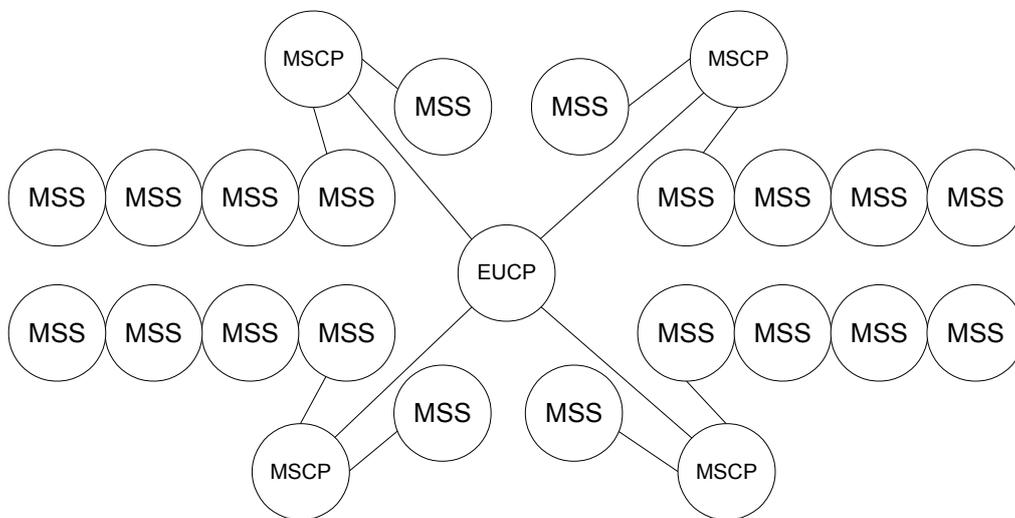
MSS = Member State System
MSCP = Member State Contact Point, EUCP = European Contact Point

127
128
129
130
131 The solution can be, that member states have own Member State Contact Points (MSCP) and
132 different state level systems are combined gradually. Then the member state system IDs can be used
133 in the European Contact Point (EUCP).
134
135 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
136 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).
137
138 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
139 there can be member state contact points (MCP). Then there can be some hierarchy between
140 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
141 with member state systems in member states. Therefore member state contact points (MCP) can

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142 reduce the complexity with European Union contact point (EUCP).
143
144   **Proposal: Different member state systems could be consolidated based on limited**
145   **number system-to-system connections.**
146
147   **Proposal: There could be some time frames for consolidating different member state**
148   **systems (MSS) with member state contact points (MSCP).**
149
150   **Proposal: There could be some time frames for consolidating member state contact**
151   **points (MSCP) with the European Union contact point (EUCP).**
152
153   **Proposal: One information system (member state contact point, MSCP) on member**
154   **state level could handle system-to-system connections with the European Union level**
155   **(European contact point).**
156
157   **Proposal: There could be some serious work for developing a standardised member**
158   **state contact point (MSCP).**
159
160   **Proposal: After developing a standardised member state contact point (MSCP)**
161   **different member states could consolidate their systems (MSS ↔ MSCP).**
162
163   **Proposal: European Union contact point (EUCP) and member state contact points**
164   **(MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European**
165   **Union level.**
166
167 Naturally we have to note that developing a standardised member state contact point (MSCP) means
168 more work. On the other hand a standardised member state contact point (MSCP) could handle
169 cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member
170 states may have more systems than other member states. We have to note that there are different
171 systems based on several technological solutions.
172
173 **About different standards**
174
175 I have proposed several times to use ***open horizontal standards*** when developing different
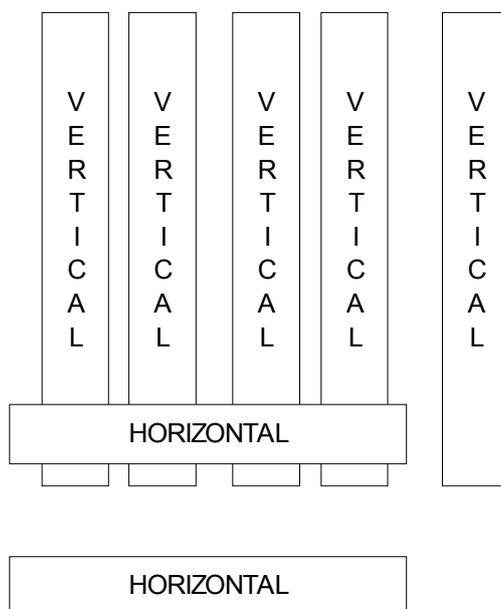176 information system.
177
178 **Favouring open standards / Favouring horizontal standards**
179
180 [Continues on the next page]
181

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

182
183
184   There are differences between horizontal and vertical standards. A simple example is naturally
185   email solutions. There are several vertical standards when creating technically email solutions. Then
186   there are horizontal standards which enable sending messages between technically different email
187   solutions.
188
189   **Proposal: There could be assessment of vertical and horizontal standards.**
190
191   **Proposal: Using horizontal standards could be favoured when creating different**
192   **information systems on the European Union level.**
193
194   Horizontal standards enables technological solutions which can work together. Horizontal standards
195   hides different complexities in information systems.
196
197   **Opinion: The number of redundant standardisation efforts should be minimal.**
198
199   **Proposal: There could be separation of horizontal standards and vertical standards.**
200
201   **Proposal: There could be different standardisation efforts to horizontal standards and**
202   **vertical standards.**
203
204   Personally I have advocated using different horizontal standards. For example email standards
205   (horizontal) are implemented with very different technologies (vertical).
206
207   Here we can note some problems:
208
209

210   •   some systems are based on **de-facto** standards
211   •   some systems are based on **de-jure** standards
212   •   there can be confrontations between **de-facto** and **de-jure** standards
213   •   there can be a monopoly situation in some domain
214   •   some standards may inhibit possible actions of some stakeholders
215   •   there can be a standard war on some domains
216   •   standards have different life-cycles
217   •   systems have different life-cycles
218   •   there can be mismatches between different life-cycles
219   •   there can be failed standards
220   •   there can be deprecated standards.
221
222   It is quite normal situation in the information technology field that there are competing standards
223   for some application field. Therefore there are all the time ongoing "standards wars" or "format
224   wars". The information technology standards tend to be interrelated and one "standards war" or
225   "format war" can lead to another similar situation.
226
227   I have advocated open standards even though in some cases open standards are not de facto
228   standards. In practice public sector has very important role, when some standards are competing in
229   the market place. Because public sector has a considerable power when buying/developing
230   information systems and therefore public sector can sometimes direct markets to certain standards.
231   Therefore there should be serious vigilance when assessing different standards and "standards" in
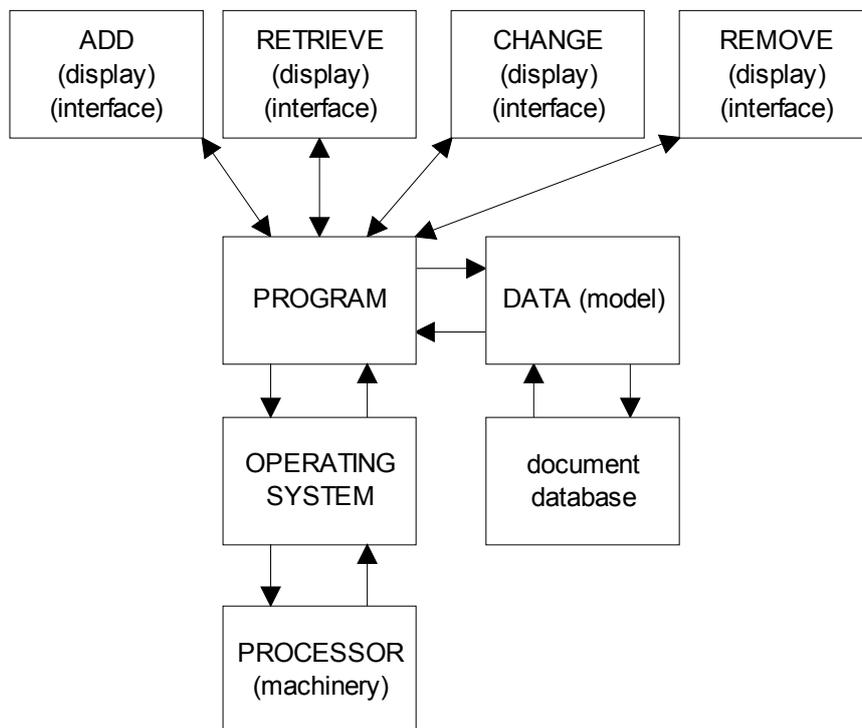232   some application fields.
233
234   **One presentation for information system**
235
236   Following figure is one conception of information system. I have presented the following figure as
237   one conception of information system.
238
239   [Continues on the next page]

```
┌──────────┐  ┌──────────┐  ┌──────────┐  ┌──────────┐
│   ADD    │  │ RETRIEVE │  │  CHANGE  │  │  REMOVE  │
│(display) │  │(display) │  │(display) │  │(display) │
│(interface)│ │(interface)│ │(interface)│ │(interface)│
└──────────┘  └──────────┘  └──────────┘  └──────────┘

            ┌──────────┐      ┌──────────┐
            │ PROGRAM  │ ←→  │DATA (model)│
            └──────────┘      └──────────┘

            ┌──────────┐      ┌──────────┐
            │OPERATING │      │ document │
            │  SYSTEM  │      │ database │
            └──────────┘      └──────────┘

            ┌──────────┐
            │PROCESSOR │
            │(machinery)│
            └──────────┘
```

240
241   Generally speaking we have different techniques on the information technology field. Here we can
242   note that programs (most arrows) are in the middle of different information systems. Then programs
243   handle the data in a system (documents and/or databases). However we have to have one specific
244   program which is different – i.e. operating system. Operating systems handle connections with
245   machinery and processors. Generally speaking programs can work with an operating system and
246   developers of programs use different parts of an operating system.
247
248   **What this means to information systems?**
249   **1)   There can be several processor (machinery) possibilities**
250   **2)   There can be several operating systems possibilities**
251   **3)   There can be several programs possibilities**
252   **4)   Programs handle data in different ways**
253   **5)   The data can modelled in different ways**
254   **6)   There can documents and/or databases in different systems**
255   **7)   There are always four basic functions (add, retrieve, change, remove).**
256   **8)   There are several providers of different computer programs.**
257   **9)   There are naturally competing programs.**
258   **10)   Different programs comply with different standards.**
259
260   We have to note that data can have different models and data (models) are developed and/or used by
261   different stakeholders (four basic functions). Especially in databases there are possibilities for
262   several data models; depending on the modellers there can be different data models in databases.
263   Generally speaking changing data models can be very difficult in many cases.
264

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265 **There can be some examples:**
266
267   **a) There could be some regulations for providing interfaces (private, public)**
268   **b) There could be some regulations for document formats (private, public)**
269   **c) There could be some regulations for transmitting data between different systems**
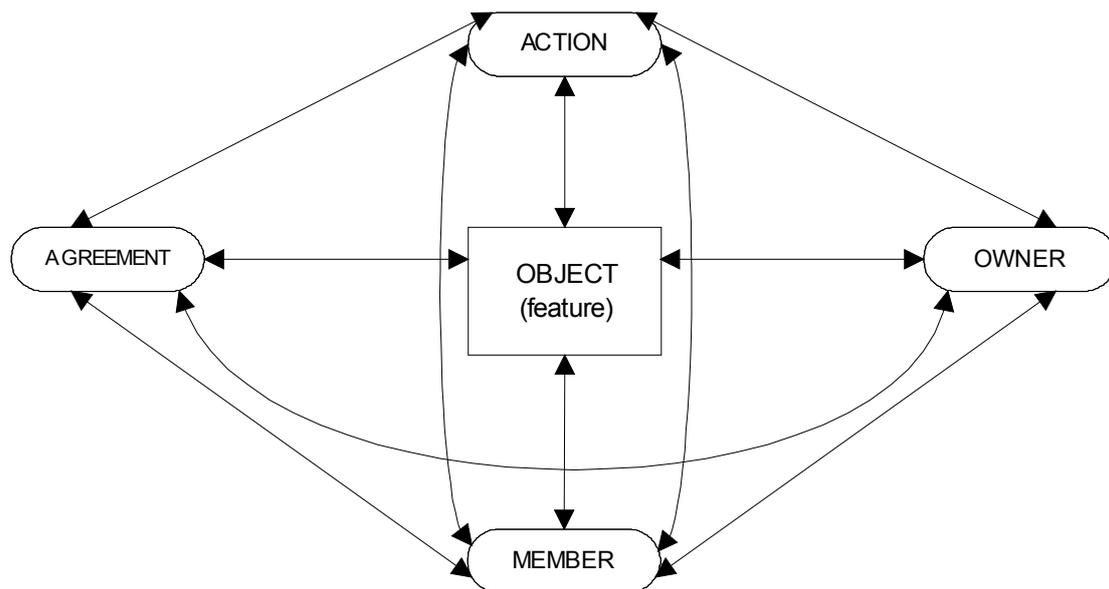270   **d) There could be some regulations for using databases (private, public)**
271   **e) There could be some regulations for using programs (private, public)**
272   **f) There could be some regulations for retrieving information from different systems.**
273

274
275   **Note: The relations between different aspects of information systems can result**
276   **rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**
277
278 Here we can note the difference between owners, agreements and members. In reality ownerships
279 agreements and memberships cause very complex networks, and those networks are changing all
280 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
281 entities, life-cycles, etc.
282
283 Here we can note that ownership, agreement and membership are interlinked in different ways.
284 Generally speaking average usage of a system means an unique combination of ownership,
285 agreement and membership. When everything works fine there are not problems. However changes
286 with ownership, agreement and membership can result difficult situations.
287
288
289
290 [Continues on the next page]
291
292
293

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294

	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				

295
296   **Note: The relations between different aspects of information systems can result**
297   **rather complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**
298
299   **Proposal: There could be some considerations for assessing possible / future changes in**
300   **ownerships, agreements and memberships.**
301
302 **More technical consultations?**
303
304 Based on answers (consultation generally) there could be more technically oriented consultations.
305 Previously mentioned issues (this opinion) could be detailed for new technically oriented
306 consultations.
307
308   **Proposal: More technically oriented consultations could be organised after this**
309   **consultation.**
310
311 For example different technical standards could be assessed carefully.
312
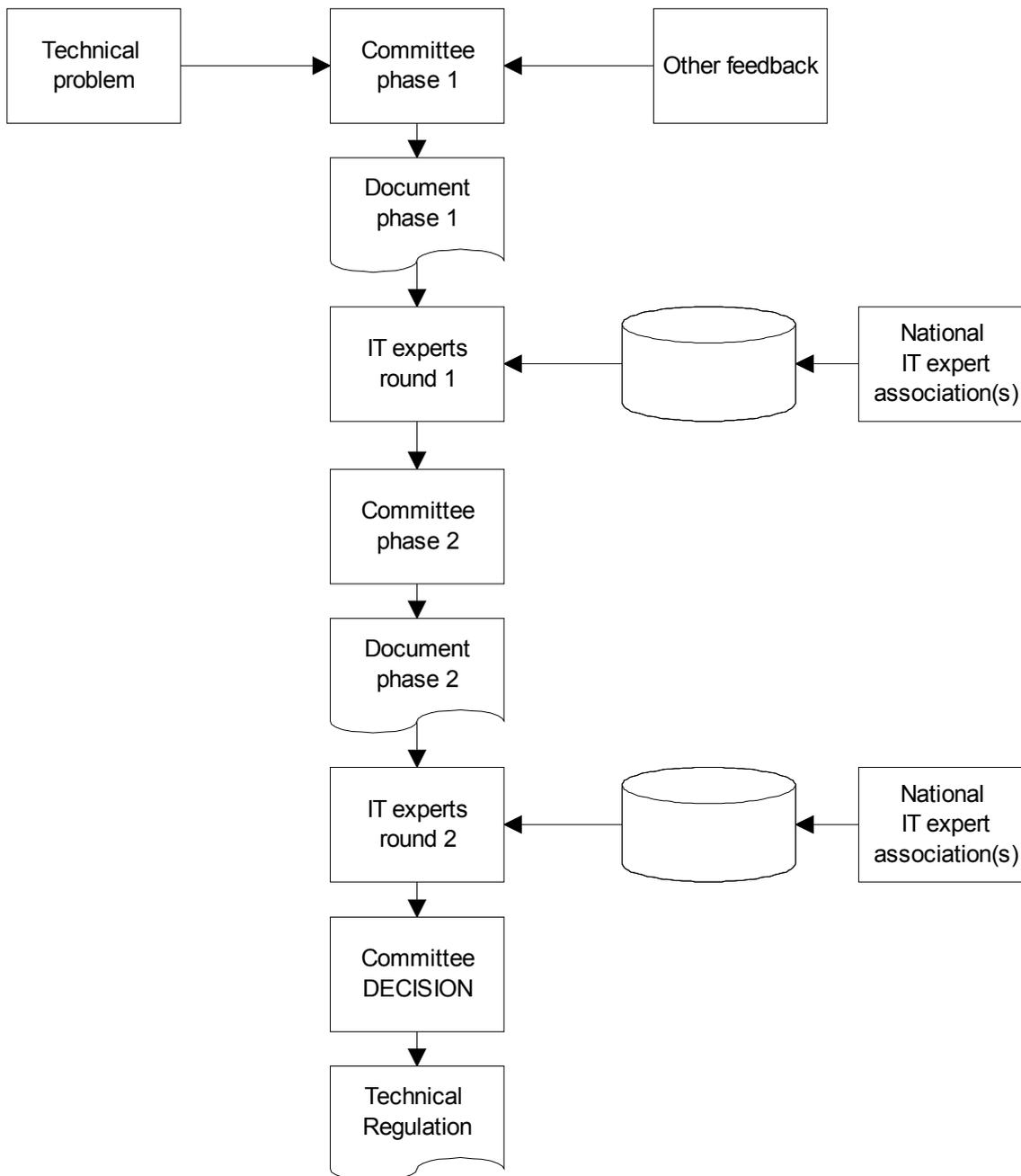313 One option is cooperation with different national IT expert associations. It can be possible to ask
314 opinions about technical issues from different national IT expert association´s members. Also other
315 expert associations could be consulted based on development and legislation of different
316 information systems. Naturally there are other stakeholders in the European Union.
317

318 One option is establishing a committee for assessing different technical standards which should be
319 as open as possible.

320

321 One option is organising two rounds for assessing different technical standards.

```
┌──────────────┐           ┌──────────────┐           ┌──────────────┐
│  Technical   │──────────▶│  Committee   │◀──────────│ Other feedback│
│   problem    │           │   phase 1    │           │              │
└──────────────┘           └──────┬───────┘           └──────────────┘
                                  │
                                  ▼
                           ┌──────────────┐
                           │  Document    │
                           │   phase 1    │
                           └──────┬───────┘
                                  │
                                  ▼
                           ┌──────────────┐      ┌─────────┐    ┌──────────────┐
                           │  IT experts  │◀─────│         │◀───│   National   │
                           │   round 1    │      │         │    │  IT expert   │
                           └──────┬───────┘      └─────────┘    │ association(s)│
                                  │                             └──────────────┘
                                  ▼
                           ┌──────────────┐
                           │  Committee   │
                           │   phase 2    │
                           └──────┬───────┘
                                  │
                                  ▼
                           ┌──────────────┐
                           │  Document    │
                           │   phase 2    │
                           └──────┬───────┘
                                  │
                                  ▼
                           ┌──────────────┐      ┌─────────┐    ┌──────────────┐
                           │  IT experts  │◀─────│         │◀───│   National   │
                           │   round 2    │      │         │    │  IT expert   │
                           └──────┬───────┘      └─────────┘    │ association(s)│
                                  │                             └──────────────┘
                                  ▼
                           ┌──────────────┐
                           │  Committee   │
                           │  DECISION    │
                           └──────┬───────┘
                                  │
                                  ▼
                           ┌──────────────┐
                           │  Technical   │
                           │  Regulation  │
                           └──────────────┘
```

322
323
324 **An example for cooperation: Web feeds (RSS and Atom)**
325

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326
327
328   I have advocated usage of web feeds [1] on several previous opinion documents. Actually there are
329   two standards for web feeds: RSS [2][3] and Atom [4][5][6].
330
331   **Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different**
332   **informations systems (EU / Member states).**
333
334   **Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-**
335   **time) information for different stakeholder(s) (communities).**
336
337   **Proposal: There can be different web feeds (RSS and/or Atom) for different**
338   **stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible**
339   **solution.**
340
341   **Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**
342
343   It can be easier to create web feeds in different information systems since web feeds enable
344   connections without direct system-to-system connections.
345
346   It can be noted, that different back-office systems (with a wide variety of different technologies) can
347   implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
348   kind solutions front-office systems dont need direct system-to-system communications with back-
349   office systems.
350
351
352
353   **Good luck!!!**
354
355   This opinion is quite limited. Hopefully there are other constructive ideas presented in other
356   opinions. This remains to be seen.
357
358
359   [Continues on the next page]
360

---

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

361
362
363   **ANNEX 1**
364
365   My opinions to the previous and relevant consultations – there consultations were mostly organised
366   by the European Commission. General page to all consultations – both in English and in Finnish:
367   http://www.jukkarannila.fi/lausunnot.html
368
369
370   My opinions to the previous and relevant consultations – there consultations were mostly organised
371   by the European Commission.
372
373   EN: Opinion 1: Review of the rules on access to documents
374   http://www.jukkarannila.fi/lausunnot.html#nro_1
375
376   EN: Opinion 2: Schools for the 21st Century
377   http://www.jukkarannila.fi/lausunnot.html#nro_2
378
379   EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
380   Safe and Innovative medicines
381   http://www.jukkarannila.fi/lausunnot.html#nro_3
382
383   EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
384   http://www.jukkarannila.fi/lausunnot.html#nro_5
385
386   EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
387   http://www.jukkarannila.fi/lausunnot.html#nro_6
388
389   EN: Opinion 8: European Interoperability Framework, version 2, draft
390   http://www.jukkarannila.fi/lausunnot.html#nro_8
391
392   EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
393   proposal for comments
394   http://www.jukkarannila.fi/lausunnot.html#nro_9
395
396   EN: Opinion 15: Collective Redress
397   http://www.jukkarannila.fi/lausunnot.html#nro_15
398
399   EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
400   http://www.jukkarannila.fi/lausunnot.html#nro_17
401
402   EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
403   http://www.jukkarannila.fi/lausunnot.html#nro_18
404
405

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406 EN: Opinion 19: Official Acknowledgement by the Commission
407 http://www.jukkarannila.fi/lausunnot.html#nro_19
408
409 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
410 http://www.jukkarannila.fi/lausunnot.html#nro_20
411
412 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
413 http://www.jukkarannila.fi/lausunnot.html#nro_21
414
415 EN: Opinion 23: Public consultation on the review of the European Standardisation System
416 http://www.jukkarannila.fi/lausunnot.html#nro_23
417
418 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
419 http://www.jukkarannila.fi/lausunnot.html#nro_27
420
421 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
422 http://www.jukkarannila.fi/lausunnot.html#nro_28
423
424 EN: Opinion 30: Internet Filtering
425 http://www.jukkarannila.fi/lausunnot.html#nro_30
426 NOTE: Organised by the European Committee for Standardization (CEN) [7]
427
428 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
429 http://www.jukkarannila.fi/lausunnot.html#nro_32
430
431 EN: Opinion 34: REMIT Registration Format
432 http://www.jukkarannila.fi/lausunnot.html#nro_34
433 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [8]
434
435 EN: Opinion 35: Exploiting the employment potential of the personal and household services
436 http://www.jukkarannila.fi/lausunnot.html#nro_35
437
438 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
439 http://www.jukkarannila.fi/lausunnot.html#nro_37
440
441 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
442 http://www.jukkarannila.fi/lausunnot.html#nro_39
443
444 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
445 http://www.jukkarannila.fi/lausunnot.html#nro_40
446
447 EN: Opinion 41: AT.39398: observations on the proposed commitments
448 http://www.jukkarannila.fi/lausunnot.html#nro_41

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

449
450   EN: Opinion 42: Opening up Education
451   http://www.jukkarannila.fi/lausunnot.html#nro_42
452
453   EN: Opinion 43: Publication of extracts of the European register of market participants
454   http://www.jukkarannila.fi/lausunnot.html#nro_43
455   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
456
457   EN: Opinion 44: Evaluation policy guidelines
458   http://www.jukkarannila.fi/lausunnot.html#nro_44
459
460   EN: Opinion 45: About ICT standardisation
461   http://www.jukkarannila.fi/lausunnot.html#nro_45
462
463   EN: Opinion 46: Review of the EU copyright rules
464   http://www.jukkarannila.fi/lausunnot.html#nro_46
465
466   EN: Opinion 51: European Area of Skills and Qualifications
467   http://www.jukkarannila.fi/lausunnot.html#nro_51
468
469   EN: Opinion 52: Trusted Cloud Europe Survey
470   http://www.jukkarannila.fi/lausunnot.html#nro_52
471
472   EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
473   http://www.jukkarannila.fi/lausunnot.html#nro_53
474   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
475
476   EN: Opinion 55: European Energy Regulation
477   http://www.jukkarannila.fi/lausunnot.html#nro_55
478   NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
479
480   EN: Opinion 59: Green paper on mobile Health
481   http://www.jukkarannila.fi/lausunnot.html#nro_59
482
483   EN: Opinion 60: Cross-border inheritance tax problems within the EU
484   http://www.jukkarannila.fi/lausunnot.html#nro_60
485
486   EN: Opinion 61: European Register of Products Containing Nanomaterials
487   http://www.jukkarannila.fi/lausunnot.html#nro_61
488
489   EN: Opinion 64: Corporate Social Responsibility - European Commission
490   http://www.jukkarannila.fi/lausunnot.html#nro_64
491
492   EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
493   http://www.jukkarannila.fi/lausunnot.html#nro_66

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494
495 EN: Opinion 68: European Network Code Stakeholder Committees
496 http://www.jukkarannila.fi/lausunnot.html#nro_68
497 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
498
499 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
500 http://www.jukkarannila.fi/lausunnot.html#nro_71
501 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
502
503 EN: Opinion 74: Enabling the Internet of Things
504 http://www.jukkarannila.fi/lausunnot.html#nro_74
505 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) [9]
506
507 EN: Opinion 80: Mandatory Transparency Register
508 http://www.jukkarannila.fi/lausunnot.html#nro_80
509
510 EN: Opinion 84: Revision of the European Interoperability Framework
511 http://www.jukkarannila.fi/lausunnot.html#nro_84
512
513 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
514 http://www.jukkarannila.fi/lausunnot.html#nro_86
515
516 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
517 http://www.jukkarannila.fi/lausunnot.html#nro_88
518
519 EN: Opinion 89: BEREC Guidelines for net neutrality rules
520 http://www.jukkarannila.fi/lausunnot.html#nro_89
521 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
522
523 EN: Opinion 93: Safety of apps and other non-embedded software
524 http://www.jukkarannila.fi/lausunnot.html#nro_93
525
526 EN: Opinion 95: Targeted consultation on eForms
527 http://www.jukkarannila.fi/lausunnot.html#nro_95
528
529 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
530 http://www.jukkarannila.fi/lausunnot.html#nro_97
531
532 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
533 http://www.jukkarannila.fi/lausunnot.html#nro_98
534
535 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
536 Regulators. Recast
537 http://www.jukkarannila.fi/lausunnot.html#nro_99

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

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538
539   EN: Opinion 100: Protection of personal data (EU)
540   http://www.jukkarannila.fi/lausunnot.html#nro_100
541
542   EN: Opinion 101: Governance of the Energy Union
543   http://www.jukkarannila.fi/lausunnot.html#nro_101
544
545   EN: Opinion 102: Smart Wearables
546   http://www.jukkarannila.fi/lausunnot.html#nro_102
547
548   EN: Opinion 106: Review of the European Union Agency for Network and Information Security
549   (ENISA)
550   http://www.jukkarannila.fi/lausunnot.html#nro_106
551
552   EN: Opinion 108: Single Digital Gateway
553   http://www.jukkarannila.fi/lausunnot.html#nro_108
554
555   EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
556   http://www.jukkarannila.fi/lausunnot.html#nro_110
557
558   EN: Opinion 111: Interoperability of information systems for migration and security
559   http://www.jukkarannila.fi/lausunnot.html#nro_111
560
561   EN: Opinion 113: Transform of health and care
562   http://www.jukkarannila.fi/lausunnot.html#nro_113
563
564   EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
565   Internet
566   http://www.jukkarannila.fi/lausunnot.html#nro_114
567   NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
568
569   EN: Opinion 118: Fake news and online disinformation
570   http://www.jukkarannila.fi/lausunnot.html#nro_118
571
572   EN: Opinion 119: European Social Security Number
573   http://www.jukkarannila.fi/lausunnot.html#nro_119
574
575   EN: Opinion 120: European Labour Authority
576   http://www.jukkarannila.fi/lausunnot.html#nro_120
577
578   EN: Opinion 121: 2nd Data Package
579   http://www.jukkarannila.fi/lausunnot.html#nro_121
580
581
582

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583   EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
584   Cybersecurity Research and Competence Centre
585   http://www.jukkarannila.fi/lausunnot.html#nro_122
586
587   EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
588   THE COUNCIL on the re-use of public sector information (recast)
589   http://www.jukkarannila.fi/lausunnot.html#nro_123
590
591   EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
592   http://www.jukkarannila.fi/lausunnot.html#nro_125
593
594   EN: Opinion 128: Summertime arrangements
595   http://www.jukkarannila.fi/lausunnot.html#nro_128
596
597   EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
598   http://www.jukkarannila.fi/lausunnot.html#nro_129
599
600   EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
601   http://www.jukkarannila.fi/lausunnot.html#nro_132
602
603   EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
604   ("eForms")
605   http://www.jukkarannila.fi/lausunnot.html#nro_133
606
607
608
609   My opinions to the previous and relevant consultations – there consultations were mostly organised
610   by the European Commission. General page to all consultations – both in English and in Finnish:
611   http://www.jukkarannila.fi/lausunnot.html
612
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616   [Continues on the next page]
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619   **ANNEX 2**
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