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TO: open-ouvert@tbs-sct.gc.ca

Government of Canada

Draft New Plan on Open Government 2016-2018

First of all, a lot of thanks to Government of Canada 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.

Government of Canada can add the PDF file of this opinion to a relevant web page.

Annex 1 holds information about previous opinions related to information technology.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

38

39 **Previous consultations about information systems / Annex 1**

40

41 Annex 1 holds a list of previous consultations about information systems.

42

43 Based on previous opinions I have explained several issues in detailed way. It can be noted that
44 some issues are repeated since many consultations concentrated on information technology.

45

46 This opinion does not repeat all previous issues (mainly information technology) mentioned on the
47 previous opinion documents.

48

49 **Commitment 3: Expand and Improve Open Data**

50

51 Here I note that open data means different standards.

52

53 There are different standards setting organisations on the information technology field. One list ¹ of
54 these standards setting organisations is provided by ConsortiumInfo.org.

55

56 One warning can be said about standards setting organisations. All standards setting organisations
57 are not successes based on several factors and there can be irrelevant standards setting
58 organisations. Market situation on different vehicle markets varies a lot based on different factors.

59

60 Here we can note some problems:

61

- 62 • some systems are based on **de-facto** standards
- 63 • some systems are based on **de-jure** standards
- 64 • there can be confrontations between **de-facto** and **de-jure** standards
- 65 • there can be a monopoly situation in some domain
- 66 • some standards may inhibit possible actions of some stakeholders
- 67 • there can be a standard war on some domains
- 68 • standards have different life-cycles
- 69 • systems have different life-cycles
- 70 • there can be mismatches between different life-cycles
- 71 • there can be failed standards
- 72 • there can be deprecated standards.

73

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

78

79 I have advocated open standards even though in some cases open standards are not de facto
80 standards. In practice public sector has very important role, when some standards are competing in
81 the market place. Because public sector has a considerable power when buying/developing

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

82 information systems and therefore public sector can sometimes direct markets to certain standards.
83 Therefore there should be serious vigilance when assessing different standards and “standards” in
84 some application fields.

85

86 **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**
87 **different organisations could be assessed carefully.**

88

89 There are differences between horizontal and vertical standards. A simple example is naturally
90 email solutions. There are several vertical standards when creating technically email solutions. Then
91 there are horizontal standards which enable sending messages between technically different email
92 solutions.

93

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

95

96 **Proposal: Using horizontal standards could be favoured when creating different**
97 **information systems.**

98

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

101

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

103

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

105

106 **Proposal: There could be different standardisation efforts to horizontal standards and**
107 **vertical standards.**

108

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

111

112

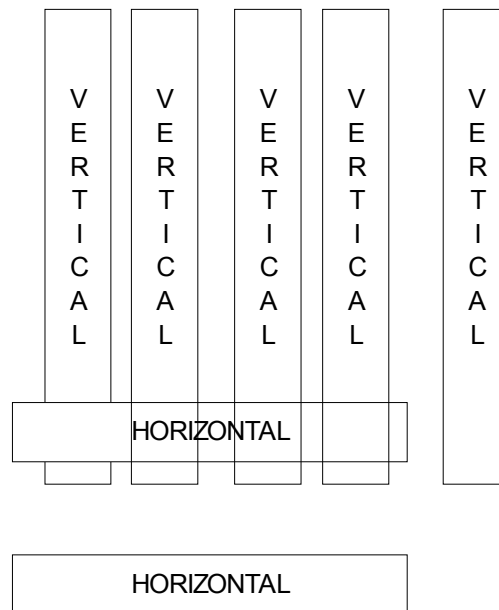
113

114 [Continues on the next page]

115

116

117



118
119

120 **Proposal: Governments should especially concentrate on horizontal standards.**

121

122 **Proposal: Some government agencies could apply for memberships of different**
123 **standard setting organisations which develop especially horizontal standards.**

124

125 **Proposal: Government agencies should not be passive by-standers when different**
126 **horizontal standards are developed.**

127

128 **Proposal: Government agencies could financially support development of horizontal**
129 **standards.**

130

131 Here we can note that developing horizontal standards is very demanding compared to developing
132 vertical standards.

133

134 **Commitment 15: Stimulate Innovation through Canada's Open Data Exchange (ODX)**

135

136 One issue is registering different stakeholder groups which use open data.

137

138 **Proposal: Different stakeholders could be registered when they are using open**
139 **governmental data.**

140

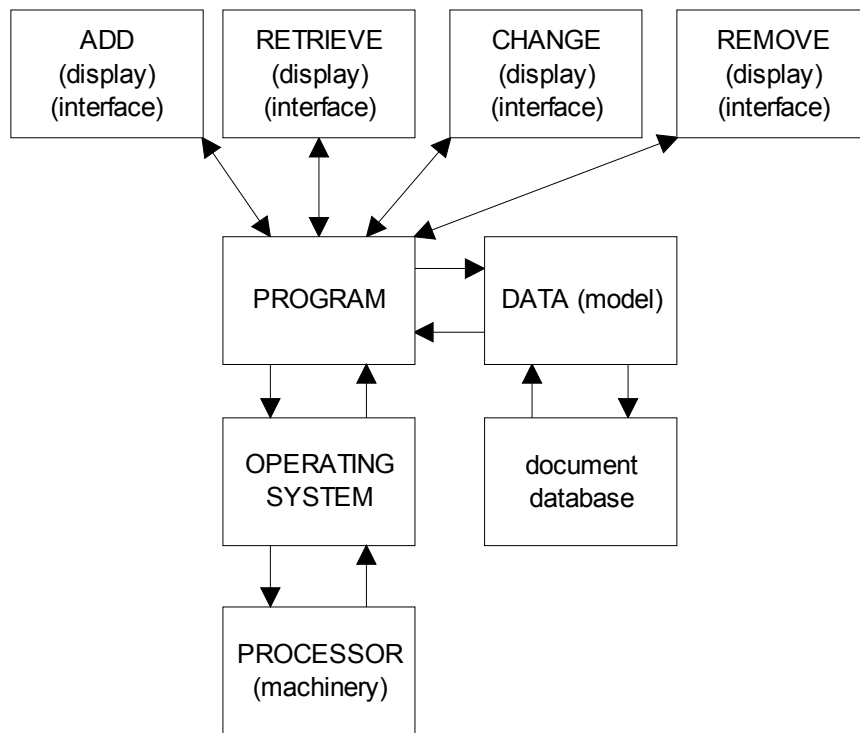
141 When different stakeholders are registered there can be some assurances that different changes are
142 informed to stakeholders.

143

144 **Membership, ownership and agreements**

145

146 Personally I have differentiated owner, members and agreements.
 147



148
 149

150 Generally speaking we have different techniques on the information technology field. Here we can
 151 note that programs (most arrows) are in the middle of different information systems. Then programs
 152 handle the data in a system (documents and/or databases). However we have to have one specific
 153 program which is different – i.e. operating system. Operating systems handle connections with
 154 machinery and processors. Generally speaking programs can work with an operating system and
 155 developers of programs use different parts of an operating system.

156

157 We have to note that data can have different models and data (models) are developed and/or used by
 158 different stakeholders (four basic functions). Especially in databases there are possibilities for
 159 several data models; depending on the modellers there can be different data models in databases.
 160 Generally speaking changing data models can be very difficult in many cases.

161

162 In the previous consultations I have advocated following solution as the maximum solution:

163

- 164 * public sector institute owns the machinery and processor of the information system
- 165 * the machinery and processor are based on relevant open standards
- 166 * the operating system is based on an open-source solution
- 167 * public sector institute owns the source code of the information system
- 168 * public sector institute owns the database of the information system
- 169 * the database is based on open-source solution and on relevant open standards
- 170 * public sector institute owns all data in the information system.

171
172 Naturally, there can be solutions, which are not based on the maximum solution.

173
174 Next table gives us some possibilities for assessing possibilities for open solutions and closed
175 solutions.

176
177 **Note: The relations between different aspects of information systems can result rather**
178 **complicated (legal) network(s): i.e. Ownership, Membership, Agreement.**

179
180 **Proposal: There could be some considerations for assessing possible / future changes in**
181 **ownerships, agreements and memberships.**

182
183 Here we can note the difference between owners, agreements and members. In reality ownerships
184 agreements and memberships cause very complex networks, and those networks are changing all
185 the time: divisions, mergers, ownership changes, agreement changes, cooperation with other
186 entities, life-cycles, etc.

187
188 Here we can note that ownership, agreement and membership are interlinked in different ways.
189 Generally speaking average usage of a system means an unique combination of ownership,
190 agreement and membership. When everything works fine there are not problems. However changes
191 with ownership, agreement and membership can result difficult situations.

192

	Owner? Member? Agreement?	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			

193

194

195 **Commitment 18: Support Openness and Transparency Initiatives around the World**

196

197 Here we can reiterate difference between vertical and horizontal standards.

198

199 **Proposal: Developing horizontal standards should be primary issue for different**
200 **initiatives around the world.**

201

202 **Open software and open standards?**

203

204 Previously mentioned horizontal standards can be supported. One issue is software (vertical) which
205 can implement some horizontal standards. Handling open data means using different software.

206

207 **Proposal: Providing open data with open software could be favoured.**

208

209 Naturally there can be private software which complies with horizontal standards – this is always
210 possible.

211

212 **Enforcing citizens to use closed software?**

213

214 An example can be different documents provided by government agencies.

215

216 **Question: Can government agencies demand usage of closed software when different**
217 **documents are sent to citizens?**

218

219 **Question: Can government agencies demand usage of closed software when citizens**
220 **send documents to government agencies?**

221

222 These questions are very important since a lot computing is about processing different documents.

223

224 Naturally open software can solve this problem but there are also commercial solutions for
225 document processing.

226

227 **Proposal: Using open software could be assessed carefully by government agencies.**

228

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

230



231

232

233 I have advocated usage of web feeds on several previous opinion documents. Actually there are two

235 standards for web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

236

237 **Proposal: Web feeds could be advocated when developing different informations**
238 **systems.**

239

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

242

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

246

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

248

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

251

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

256

257

258 **Good luck!!!**

259

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

262

263 [Continues on the next page]

264

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_\(standard\)](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

265

266

ANNEX 1

267

I have constructed different opinions about different issues, and on the following web page
are all written (PDF files) opinions:

269

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

270

**I have constructed specifically opinions related to information systems – both in English and
in Finnish.**

273

Here is the list of opinions related to information systems.

274

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

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

278

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

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

282

EN:Opinion 13: Final Committee Draft ISO/IEC FCD3 19763-2

http://www.jukkarannila.fi/lausunnot.html#nro_13

285

EN: Opinion 14: SFS discussion paper / SFS:n keskusteluasiakirja

http://www.jukkarannila.fi/lausunnot.html#nro_14

288

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

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

291

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

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

294

EN: Opinion 19: Official Acknowledgement by the Commission

http://www.jukkarannila.fi/lausunnot.html#nro_19

297

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

http://www.jukkarannila.fi/lausunnot.html#nro_20

300

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

http://www.jukkarannila.fi/lausunnot.html#nro_21

303

EN: Opinion 23: Public consultation on the review of the European Standardisation System

http://www.jukkarannila.fi/lausunnot.html#nro_23

306

EN: Opinion 24: ISO/IEC JTC 1 / SC 34 / WGs 1, 4 and 5 in Helsinki 14-17 June 2010

http://www.jukkarannila.fi/lausunnot.html#nro_24

309

310 FI: Lausunto 29: Avoimen demokratian avoimen datan avaamisen detaljit (ADADAD)

311 http://www.jukkarannila.fi/lausunnot.html#nro_29

312

313 EN: Opinion 30: Internet Filtering

314 http://www.jukkarannila.fi/lausunnot.html#nro_30

315

316 FI: Lausunto 31: Terveystieteiden tietotekniikasta

317 http://www.jukkarannila.fi/lausunnot.html#nro_31

318

319 EN: Opinion 32: COMP/C-3/39.692/IBM - Maintenance services

320 http://www.jukkarannila.fi/lausunnot.html#nro_32

321

322 FI: Lausunto 33: Julkishallinnon tietoluovutusten periaatteet ja käytännöt

323 http://www.jukkarannila.fi/lausunnot.html#nro_33

324

325 EN: Opinion 34: REMIT Registration Format

326 http://www.jukkarannila.fi/lausunnot.html#nro_34

327

328 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes

329 http://www.jukkarannila.fi/lausunnot.html#nro_37

330

331 FI: Lausunto 38: SADe-ohjelman avoimen lähdekoodin toimintamallin luonnos

332 http://www.jukkarannila.fi/lausunnot.html#nro_38

333

334 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems

335 http://www.jukkarannila.fi/lausunnot.html#nro_39

336

337 EN: Opinion 41: AT.39398: observations on the proposed commitments

338 http://www.jukkarannila.fi/lausunnot.html#nro_41

339

340 EN: Opinion 43: Publication of extracts of the European register of market participants

341 http://www.jukkarannila.fi/lausunnot.html#nro_43

342

343 EN: Opinion 45: About ICT standardisation

344 http://www.jukkarannila.fi/lausunnot.html#nro_45

345

346 EN: Opinion 46: Review of the EU copyright rules

347 http://www.jukkarannila.fi/lausunnot.html#nro_46

348

349 EN: Opinion 47: Sharing or collaborating with government documents

350 http://www.jukkarannila.fi/lausunnot.html#nro_47

351

352 FI: Lausunto 49: JSH 166 -suosituksen päivitys

353 http://www.jukkarannila.fi/lausunnot.html#nro_49

354

- 355 EN: Opinion 52: Trusted Cloud Europe Survey
356 http://www.jukkarannila.fi/lausunnot.html#nro_52
357
- 358 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
359 http://www.jukkarannila.fi/lausunnot.html#nro_53
360
- 361 EN: Opinion 54: Government Content Management System
362 http://www.jukkarannila.fi/lausunnot.html#nro_54
363
- 364 EN: Opinion 55: European Energy Regulation
365 http://www.jukkarannila.fi/lausunnot.html#nro_55
366
- 367 EN: Opinion 56: National Identity Proofing Guidelines
368 http://www.jukkarannila.fi/lausunnot.html#nro_56
369
- 370 FI: Lausunto 58: Puoluekokousaloitteet / 2010 ja 2014
371 http://www.jukkarannila.fi/lausunnot.html#nro_58
372
- 373 EN: Opinion 59: Green paper on mobile Health
374 http://www.jukkarannila.fi/lausunnot.html#nro_59
375
- 376 EN: Opinion 60: Cross-border inheritance tax problems within the EU
377 http://www.jukkarannila.fi/lausunnot.html#nro_60
378
- 379 EN: Opinion 61: European Register of Products Containing Nanomaterials
380 http://www.jukkarannila.fi/lausunnot.html#nro_61
381
- 382 FI: Lausunto 65: Lausuntopyyntö nettiäänestystyöryhmän väliraportista
383 http://www.jukkarannila.fi/lausunnot.html#nro_65
384
- 385 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
386 http://www.jukkarannila.fi/lausunnot.html#nro_66
387
- 388 FI: Lausunto 67: Valtioneuvoston hanketiedon esiselvityksestä
389 http://www.jukkarannila.fi/lausunnot.html#nro_67
390
- 391 EN: Opinion 68: European Network Code Stakeholder Committees
392 http://www.jukkarannila.fi/lausunnot.html#nro_68
393
- 394 FI: Lausunto 69: Hallituksen esitys (luonnos 16.4.2015) vieraslajeista
395 http://www.jukkarannila.fi/lausunnot.html#nro_69
396
- 397 EN: Opinion 70: Providing better APIs in New Zealand
398 http://www.jukkarannila.fi/lausunnot.html#nro_70
399

- 400 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
401 http://www.jukkarannila.fi/lausunnot.html#nro_71
402
- 403 EN: Opinion 72: Queensland biofuel mandate
404 http://www.jukkarannila.fi/lausunnot.html#nro_72
405
- 406 EN: Opinion 73: Financial / Conceptual Frameworks
407 http://www.jukkarannila.fi/lausunnot.html#nro_73
408
- 409 EN: Opinion 74: Enabling the Internet of Things
410 http://www.jukkarannila.fi/lausunnot.html#nro_74
411
- 412 EN: Opinion 78: Consumer Complaints Register (NSW)
413 http://www.jukkarannila.fi/lausunnot.html#nro_78
414
- 415 EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015
416 http://www.jukkarannila.fi/lausunnot.html#nro_79
417
- 418 EN: Opinion 80: Mandatory Transparency Register
419 http://www.jukkarannila.fi/lausunnot.html#nro_80
420
- 421 EN: Opinion 81: Records and Information Management Standard
422 http://www.jukkarannila.fi/lausunnot.html#nro_81
423
- 424 EN: Opinion 84: Revision of the European Interoperability Framework
425 http://www.jukkarannila.fi/lausunnot.html#nro_84
426
- 427 EN: Opinion 85: Regulatory options for automated vehicles
428 http://www.jukkarannila.fi/lausunnot.html#nro_85
429
- 430 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
431 http://www.jukkarannila.fi/lausunnot.html#nro_86
432
- 433 EN: Opinion 87: Assessing privacy and big data on the Internet
434 http://www.jukkarannila.fi/lausunnot.html#nro_87
435
- 436 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
437 http://www.jukkarannila.fi/lausunnot.html#nro_88
438
- 439 EN: Opinion 89: BEREC Guidelines for net neutrality rules
440 http://www.jukkarannila.fi/lausunnot.html#nro_89
441
- 442 EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)
443 http://www.jukkarannila.fi/lausunnot.html#nro_90
444

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446

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448

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490



7 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three “old” parties were not traditionally as the three largest parties. On 2015 this “new” party is part of the current Finnish Government. We all must be interested about this new development in Finland.