

# Open Public Consultation: Revision of the European Interoperability Framework (Research centres / Academic institutions / Standardisation organisation/ Business supplying services to public administrations)

Fields marked with \* are mandatory.

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## **Introduction**

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**\*What is your nationality?**

- Austrian  Belgian  British  Bulgarian  Croatian  Cypriot
- Czech  Danish  Dutch  Estonian  Finnish  French
- German  Greek  Hungarian  Icelandic  Irish  Italian
- Latvian  Liechtensteiner  Lithuanian  Luxembourgish  Maltese  Norwegian
- Polish  Portuguese  Romanian  Slovak  Slovenian  Spanish
- Swedish  Other

**\*Where do you work?**

- Austria  Belgium  Bulgaria  Croatia  Cyprus  Czech Republic
- Denmark  Estonia  Finland  France  Germany  Greece
- Hungary  Iceland  Ireland  Italy  Latvia  Liechtenstein
- Lithuania  Luxembourg  Malta  Netherlands  Poland  Portugal
- Romania  Slovakia  Slovenia  Spain  Sweden  United Kingdom
- Norway  Other

**\***

**Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Strategy and its content.**

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know / No opinion

\*Before you reply to this public consultation, please tell us to what extent you are aware of the European Interoperability Framework and its content.

- Fully aware
- Partially aware
- I only found out about it through this public consultation
- Don't know / No opinion

## 2. Publication consent

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\*

Please indicate your preference for the publication of your response on the Commission's website:

- Under the name given:** I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously:** I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential.** (it will not be published, but will be used internally within the Commission)

## 3. Accompanying document

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The document accessible [here](#) is a draft version of the revised European Interoperability Framework (EIF). While still being under continuous improvement by the Commission Services, it already reflects the results of a targeted consultation with the Member States representatives to ISA programme (the predecessor of ISA<sup>2</sup>), as well as other inputs.

The EIF is a technical document, mainly addressing recommendations on interoperability, based on an [existing framework](#) and as such is herewith consulted with stakeholders. It mainly addresses recommendations on interoperability, the wording and impact of which are assessed through this consultation's questions. You are thus invited to familiarise yourselves with this draft EIF, so as to better understand the context of the questions. You will have the possibility to provide your feedback by answering this consultation's questions as well as through a free comment box available at the end of section 5 of this consultation.

## 4. Assess the need of revising the EIS and EIF

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In December 2010, the Commission adopted the Communication "[Towards interoperability for European public services](#)" that included the [European Interoperability Strategy \(EIS\)](#) and [European Interoperability Framework \(EIF\)](#).

Following recent political, legal and technological evolutions, a revision is now necessary so that interoperability is ensured for the public services of the Digital Single Market and that e-barriers do not emerge between the public administrations of the Member States to the detriment of other public administrations, businesses and citizens that need to interact with them.

Questions included in the following sections will focus, on the one hand, on interoperability at Member States' (national) level and, on the other hand, on interoperability at cross-border level.

## 4.1 Assessment of needs and problems of interoperability

Interoperability has different dimensions, it may concern interactions within public administrations and between public administrations and businesses and citizens, within the **national** borders of an individual Member State or **cross-border**, i.e. when it has to be established between public administrations of different countries or between businesses and public administrations that are not located in the same country.

**\*Q1. Please select up to 10 major problems that you identify as obstructing the implementation of interoperability at national level.**

*at most 10 choice(s)*

- There is no single legal framework in Member States within the area of interoperability across sectors (legislation in the area of interoperability tends to be sectorial).
- There is a lack of resources available for implementing interoperability in Member States.
- Interoperability is not a priority in the political agenda of Member States.
- There is a lack of a consolidated view on all the existing interoperability national initiatives in Member States.
- The IT budget of Member States is largely affected by the maintenance of legacy systems.
- Interoperability is not perceived as a worthwhile investment in Member States.
- EU funds, i.e. European Structural and Investment Funds (ESIF) that could be used to implement interoperability are not well leveraged by Member States.
- The implementation of interoperability initiatives in Member States is not sufficiently monitored.
- There is a shortage of skills to implement interoperability-related policies and initiatives in Member States.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Technological evolution in Member States is largely affected by the maintenance of legacy systems.
- There is a lack of standards to sufficiently ensure interoperability or standards, even if available, are not enough integrated by suppliers in their solutions.
- There is a lack of a national public procurement strategy or guidelines, especially with regards to reference to standards and specifications
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in.
- The costs and benefits of interoperability are not assessed when developing national legislation.
- Some of the Member States' policies may contain requirements that are not supported by / adapted to the market (e.g. reference to specific technologies as being the only permissible solutions).
- Other
- Don't know / No opinion

**\*Q2. Please select up to 10 major problems that you identify as obstructing the implementation of cross-border interoperability.**

*at most 10 choice(s)*

- National interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF (adopted in 2010) since they were adopted before the ones at EU level.
- National interoperability frameworks and/or strategies are not fully aligned with the EIS and EIF, since the latter do not always capture the needs of Member States' public administrations.
- There is a lack of resources available for implementing cross-border interoperability in Member States.
- Cross-border interoperability is not a priority in the political agenda of Member States.
- There is a lack of a consolidated view on all the existing cross-border interoperability initiatives in Member States.
- The IT budget of Member States is largely affected by the maintenance of legacy systems.
- Cross-border interoperability is not perceived as a worthwhile investment in Member States.
- European Structural and Investment Funds (ESIF) that could be used to implement cross-border interoperability are not well leveraged by Member States.
- There is a shortage of skills to implement cross-border interoperability-related policies and initiatives in Member States.
- There is a shortage of qualified IT personnel having project management skills to run multinational and multi-stakeholder initiatives.
- Cross-border digital public services available in Member States are not (although it is needed) sufficiently multilingual.
- There is a limited demand from citizens, businesses and/or administrations for digital cross-border public services (e.g. cross-border mobility is low).
- Existing cross-border digital public services available in Member States are not sufficiently known by citizens, businesses and/or public administrations (lack of awareness).
- National portals tend to be fragmented.
- National portals are not sufficiently integrated with EU portals.
- Technological evolution in Member States is largely affected by the maintenance of legacy systems.
- Public administrations tend to use proprietary IT solutions, which often create a situation of vendor lock-in.
- There is a lack of interoperability standards or Member States are using different standards
- Interoperability standards, even when available, are not widely used
- Other
- Don't know / No opinion

**\*Q3. In your view, what are the main problems, if any, faced by businesses when using digital public services provided by European public administrations, at national or cross-border levels?**

- Not all digital public services are exposed for use by the IT systems of businesses, so manual work is still needed
- Different digital public services, exposed for use by the IT systems of businesses, are using different standards (lack of a common approach for standards and specifications at national level)
- There is no one single portal through which businesses can access all digital public services.
- The public services are not all fully digitised. Businesses have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- Published information is not complete, not concise enough, outdated or irrelevant
- Businesses face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Information is not sufficiently translated in the language of businesses' interest
- Businesses have to submit, although electronically, the same data many times when using different digital services
- Businesses have to use different ways of authenticating themselves for the different digital services they are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know / No opinion

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**Please describe the other problem(s) faced by businesses when using digital public services nationally or cross-border.**

The use of technologies that do not adhere to open standards, may them be formats or protocols, makes interoperability in some cases hard or impossible to achieve.



**\*Q4. In your view, what are the main problems, if any, faced by citizens when using digital public services provided by European public administrations, at national or cross-border levels?**

- There is no one single portal through which citizens can access all digital public services
- The public services are not all fully digitised. Citizens have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence
- Citizens have no trust that transactions and personal data will be secured
- Citizens face accessibility issues: the user interface is not well designed or it is difficult to navigate through the content or access for people with disabilities or the elderly is not taken into account
- Published information is not complete, not concise enough, outdated or irrelevant
- Citizens do not get enough support while using digital public services
- Citizens have to submit, although electronically, their personal data many times when using different digital services
- Citizens have to use different ways of authenticating themselves for the different digital services they are accessing
- The digital public services available are not user-friendly enough (e.g. use of legal and administrative jargon)
- Other
- Don't know / No opinion

**\*Please describe the other problems faced by citizens when using digital public services nationally or cross-border.**

The use of technologies that do not adhere to open standards, may them be formats or protocols, forces them to use, in some cases, some particular technology or software, where citizens should be free to use the software of their choice, and not be forced to acquire a particular piece of software.

## 5. Assess the impact of the EIS/EIF revision

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The “revision and extension” of the EIF is part of the Roadmap for the implementation of the Digital Single Market. In parallel, the Commission will propose a strategy, the EIS, to ensure that the EIF recommendations are addressed through concrete actions.

This section of the survey will shape the elements to be included in the revised EIF, assess the complexity of their implementation and identify the type and severity of their impacts. It will also identify the priorities to be tackled by the EIS.

### 5.1 Assessment of the revision of the EIS

**\*Q5. Do you agree that the vision for a revised EIS should be that "By 2020, citizens and businesses should benefit from interoperable user-centric digital public services, at national and EU levels, in support to the free movement of goods, persons and services throughout the Union"?**

- Yes
- No
- Don't know / No opinion







The EIS should be considered from both the European and national perspectives. The following set of key actions was identified through consultation with the Member States' representatives in the ISA (Interoperability Solutions for European Public Administrations) Committee and with EC officials. Those actions should be assessed to allow for their better prioritisation in the revised EIS to realise the European Union's overall and Member States' individual national interoperability objectives.

**Q6. Please indicate the level of importance of each of the following actions with regard to the benefits that they may generate at national level in spite of the potential complexity of implementing any individual one.**

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*1. Define and implement a governance structure to enable interoperability of digital public services at national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>*3. Put in place optimised organisational structures for delivering integrated (end-to-end) digital public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*4. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable end-to-end public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*5. Develop and promote monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*6. Ensure users' involvement in the design of national public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*7. Ensure effective communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness</p>						
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<p>*8. Promote the use of interoperable solutions including those produced by EC programmes in particular by ISA/ISA<sup>2</sup> (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*9. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>*10. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*11. Support activities related to security and data protection issues of public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



<p>*12. Support activities that facilitate the flow of information among national, regional and local administrations and between them and businesses and citizens</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*13. Support activities ensuring that the "digital" dimension is considered when preparing national legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision-making and the national legislative process</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>*14. Align with and promote the use of the European Interoperability Reference Architecture (EIRA)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*15. Enrich and reuse solutions contained in the European Interoperability Cartography (EICart)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*16. Ensure that data is transferrable between public services without restrictions, with respect to data protection and security rules</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**\*Q7. Are there any additional important action(s) that could better support interoperability at national level?**

- Yes
- No
- Don't know / No opinion

**\*Please further detail the proposed additional action(s).**







Ensure that all systems use open standards.







**Q8. Please indicate the level of importance of each of the following actions with regard to the benefits that they may generate in the context of cross-border interoperability between EU countries in spite of the potential complexity of implementing any individual one.**

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*1. Define and promote governance structure/s for the interoperable management of digital public services at European level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2. Identify, liaise and share governance practices with relevant policies and their governance structures at EU or national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*3. Ensure that interoperability requirements and solutions are taken into account when preparing and evaluating legislation at EU and national level</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*4. Put in place optimised organisational structures for delivering integrated (end-to-end) digital public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*5. Develop tools and methods to allow public services to align their business processes, thus resulting to interoperable European public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*6. Develop and promote monitoring mechanisms to assess the interoperability maturity and to measure the costs and benefits of the digital public services delivered to citizens and businesses</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*7. Ensure users' involvement in the design of European public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*8. Prepare a communication strategy and have it implemented</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*9. Ensure effective communication channels, informal or under formal agreements, between interoperability stakeholders to collect, share and respond to interoperability needs and raise awareness</p>						
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<p>*10. Promote the use of interoperable solutions, including those produced by EC programmes in particular by ISA/ISA<sup>2</sup> (Internal Market Information system, sTESTA, open e-PRIOR) and Connecting Europe Facility (e.g. eID, eSignature, eDelivery and eInvoicing building blocks)</p>						
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<p>*11. Support activities related to the development and operation of Trans European Systems supporting EU policies, including their underlying network infrastructure</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*12. Support activities related to access to European/national Base Registries (e.g. population, land, vehicles, criminal, etc.)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*13. Support activities related to the description, organisation and availability of catalogues of European and national public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>*14. Support activities related to the description, management and publication of information, including public Open Data so that public data are freely available for the use and reuse by others, unless restrictions apply.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*15. Support activities related to security and data protection issues of public services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>*16. Support activities that facilitate the flow of information between national, regional and local administrations and between them and businesses and citizens</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*17. Support activities ensuring that the "digital" dimension is considered when preparing EU legislation, the digital impact is properly assessed and proper IT solutions are in place to facilitate decision and law making</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>*18. Align with and promote the European Interoperability Reference Architecture (EIRA)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*19. Put in place and operate the European Interoperability Cartography (EICart) and feed it with reusable and interoperable solutions from the EC, the Member States' administrations and other sources</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*20. Ensure that data is transferrable between the European public services without restrictions , with respect to data protection and security rules</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**\*Q9. Are there any additional important action(s) that could better support interoperability at European level?**

- Yes
- No
- Don't know / No opinion

**\*Please further detail the proposed additional action(s).**

Ensure that all systems and services use only open standards.

## 5.2 Assessment of the revision of the EIF

The revised and extended EIF will be the enhanced structure to provide guidance to public administrations regarding the definition, design and implementation of public services in the European Union. The EIF will have to be updated to reflect the recent evolution of the EU legislation and digital strategies as well as the emerging technological trends.

This section deals with the collection of input in relation to the importance of the proposed revised recommendations, the complexity of their implementation and impacts that they may produce (costs and benefits).

**\*Q10. Please select up to 10 areas in which you expect the EIF to contribute the most with regard to the implementation of interoperability in the different Member States as well as in Europe in general.**

*at most 10 choice(s)*

- Cost savings
- Time savings
- Increased revenue
- Reduced operational costs
- Software vendor lock-in avoidance
- Support innovation
- Support employment
- Facilitate reuse, sharing and adoption of future solutions
- Increase transparency
- Increase growth and competitiveness
- Protection of fundamental rights
- Reduced CO2 emissions
- Better decision making
- Advance public and private policy goals
- Higher satisfaction levels in services for the direct beneficiaries of interoperability solutions
- Improved compliance for organisations implementing, operating and maintaining interoperability solutions
- Better data quality
- Better data availability
- Improved security
- Other
- Don't know/ No opinion

**Q11. Please indicate the level of importance of the following recommendations with regard to the benefits they may generate in the different Member States in spite of the potential complexity of implementing any individual one.**

The EIF adheres to certain interoperability principles; notably subsidiarity and proportionality, reusability, technological neutrality and adaptability, openness and transparency, user-centricity, inclusion and accessibility, security and privacy, multilingualism, administrative simplification, preservation of information, effectiveness and efficiency.

The EIF will be effective and serve its purpose to boost interoperability at European and national levels, when National Interoperability Frameworks (NIFs) are aligned with it. NIFs could be further tailored and extended to better meet the national context and needs.

The Members States should aim for openness and transparency, reuse and share solutions (including data) which are technologically neutral, easily accessible, secure, multilingual and also cater for proper preservation of exchanged information.

You can access a full description of each recommendation by clicking [here](#).

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*1. Data transferability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2. User involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*3. Once-only submission of information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*4. Administrative simplification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*5. Effectiveness and efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>



For the establishment of European Public Services, public administrations should adopt service models that allow the reuse, whenever possible, of existing services and data components (building blocks, preferably loosely coupled with each other) and put in place and maintain the necessary infrastructure.

For this purpose, the EIF proposes a **Conceptual Model** the components of which, and corresponding recommendations, are presented below.

You can access a full description of each recommendation by clicking [here](#).

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*6. Base Registries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*7. Open data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*8. Service Catalogues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*9. Security and privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

The EIF proposes a **layered interoperability model** and recommends that public administrations should ensure proper “Interoperability governance” of their interoperability activities, also through alignment with the European Interoperability Framework and continuous monitoring. Recommendations stemming from the proposed model are listed below.

You can access a full description of each recommendation by clicking [here](#).

	Not at all important	Rather not important	Neither important nor unimportant	Rather important	Very important	Don't know / No opinion
*10. Standards and specifications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*11. Open specifications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*12. Interoperability and public services governance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*13. Legal interoperability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*14. Organisational interoperability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*15. Information interoperability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*16. Technical interoperability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Different impacts may result from the implementation of the aforementioned actions. These impacts can be positive (also referred to as "benefits" in the remainder of this questionnaire) or negative (also referred to as "costs" in the remainder of this questionnaire) and can be grouped into the following three categories:

- Economic impacts: changes in costs (compliance cost, increased revenue, reduced operational cost, etc.), changes in time needed to perform an activity (that could often be translated in economic impact), administrative burdens to businesses and citizens, impact on the potential for innovation, competitiveness, technological development, etc.
- Social impacts: impacts on fundamental/human rights, changes in employment levels or job quality, social inclusion, impacts on health, security (including crime and terrorism), education, accessibility to and quality of public services, citizens' participation in decision-making, etc.
- Environmental impacts: positive and negative impacts associated with the changing status of the environment such as climate change, air, water and soil pollution, etc.

**Q12. Please indicate, if any, the expected types of benefits resulting from the implementation of the following recommendations.**

	Economic (for businesses and/or citizens)	Economic (for public administrations)	Social	Environmental	Other	None	Don't know / No opinion
*1. Data transferability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*2. User involvement	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*3. Once-only submission of information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*4. Administrative simplification	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*5. Effectiveness and efficiency	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*6. Base Registries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*7. Open data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*8. Service Catalogues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*9. Security and Privacy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*10. Standards and specifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*11. Open specifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*12. Interoperability and public services governance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*13. Legal interoperability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*14. Organisational interoperability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*15. Information interoperability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*16. Technical interoperability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**\*Q13. In your opinion, would you say that businesses will also benefit from the EIF revision?**

- Yes
- No
- Don't know / No opinion

**\*Q14. In your opinion, would you say that citizens will also benefit from the EIF revision?**

- Yes
- No
- Don't know / No opinion

Administrative burdens are the costs to businesses and citizens for complying with the information obligations resulting from government imposed legislation and regulation.

**\*Q15. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for citizens?**

- Fully agree
- Agree
- Neither agree nor disagree
- Disagree
- Fully disagree
- Don't know / No opinion

**Please feel free to comment on your answer.**

Provided that open standards are mandated, and thus FRAND licenced standards are not accepted, citizens will benefit from this measures.

**\*Q16. In your opinion, to what extent do you agree that the aforementioned recommendations will contribute to reducing administrative burden for businesses?**

- Fully agree
- Agree
- Neither agree nor disagree
- Disagree
- Fully disagree
- Don't know / No opinion

**Please feel free to comment on your answer.**

Provided that open standards are mandated, and thus FRAND licenced standards are not accepted, businesses will benefit from this measures.

**\*Q17. Please select up to 10 recommendations that should have the highest priority to be implemented within Member States' public administrations in order to better achieve interoperability during the 2017-2020 period.\***

*at most 10 choice(s)*

- Solutions and data reusability
- Openness and Transparency
- Technological neutrality and data transferability
- User centricity (user involvement, once only submission of information...)
- Inclusion and accessibility
- Security and privacy
- Multilingualism
- Once-only submission of information
- Administrative simplification
- Preservation of information
- Effectiveness and efficiency
- Base Registries
- Open data
- Service Catalogues
- Standards and specifications
- Interoperability governance
- Public service governance
- Legal interoperability
- Organisational interoperability
- Information interoperability
- Technical interoperability
- Don't know / No opinion

**Q18. As mentioned at the beginning of this consultation, please feel free to express any further comment that you may have on the draft revised EIF text.**

While we welcome the revised EIF text, we can't but be fearful of its statements regarding FRAND licensing practices. FRAND (allegedly "fair, reasonable, and non-discriminatory") licensing terms for standards are said that "will foster competition", which we totally disagree. FRAND licenses are highly anti-competitive in nature and it is a well-established fact that they make it impossible for a standard to be implemented in Free Software. The adoption of open standards should be mandatory, and that would mean that FRAND licensed standards should not be allowed.

To be clear, the definition of Open Standard we're adhering here to, is the one that states that:

An Open Standard refers to a format or protocol that is:

- a) Subject to full public assessment and use without constraints in a manner equally available to all parties;
- b) Without any components or extensions that have dependencies on formats or protocols that do not meet the definition of an Open Standard themselves;
- c) Free from legal or technical clauses that limit its utilisation by any party or in any business model;
- d) Managed and further developed independently of any single supplier in a process open to the equal participation of competitors and third parties;
- e) Available in multiple complete implementations by competing suppliers, or as a complete implementation equally available to all parties.

## 6. Subsidiarity

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The Impact Assessment also verifies whether EU action in areas beyond its exclusive competence is compatible with the principle of subsidiarity.

As defined in [Article 5\(3\) of the Treaty on European Union](#), the Union should intervene only if it is able to act more effectively than EU countries at their national or local levels.

**\*Q19. Do you agree that, with regard to the revisions of the EIS and the EIF, action at EU level provides clear added value compared to action taken at Member State level?**

- Yes
- No
- Don't know / No opinion

**\*Please explain the main differentiating benefit of an EU action compared to an action taken at Member States level.**

The different approaches seen in different Member States regarding interoperability makes them, in some cases, incompatible. It is seen, by now, that an accepted standard in a country isn't in another, for instance. That not only causes uncertainty to citizens and even to the legislator, but mostly, it hinders development and innovation, in a costly manner.

**Contact**

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