

Open Public Consultation: Revision of the European Interoperability Framework (Citizens)

Fields marked with * are mandatory.

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Introduction

***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 live?**

- 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

*

How old are you?

- Under 20
- 20-40
- 41-65
- More than 65

***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
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2. Publication consent

***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- Please keep my contribution confidential.** (it will not be published, but will be used internally within the Commission)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. Assess the need of revising the EIS and EIF

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.

3.1 Assessment of needs and problems at Member States level

The following set of questions will address [interoperability at Member State level](#), i.e. between citizens and national public administration's entities of different levels and sectors.

***Q1. How often have you used the digital public services provided by your country's administrations during the last year?**

- Never used
- Rarely used
- Occasionally used
- Frequently used
- Always used
- Don't know / No opinion

***What are the main issues, if any, that you have faced when using digital public services provided by your country's administrations?**

We need a connection with the Davinci database that holds records about (adult) students. We have requested a dump of the data related to one of our clients and we were sent Microsoft Excel files. These files don't use an open standard and forces us to use Microsoft Office which in it's return requires the use of Microsoft Windows.

***Q2. How likely is it that you would prefer using digital public services provided by your country's administrations instead of other means (e.g. post, phone calls, physical presence)?**

- Not at all likely
- Rather not likely
- Neither likely nor unlikely
- Rather likely
- Very likely
- Don't know / No opinion

Please feel free to comment on your answer.

When regarding services provided by my country's administration that involve personal information I still prefer to receive them by post. Many of the services provided use different backends and frontends and would require many accounts on these services which is not user-friendly. E-mail is unreliable and unsecure and many of these services make use of it for sending information.

***Q3. To what extent did the digital public services provided by your country's administrations meet or exceed your expectations?**

- Far below my expectations
- Slightly below my expectations
- Meet my expectations
- Slightly above my expectations
- Far above my expectations
- Don't know / No opinion

***Please select the reason(s) why digital public services provided by your country's administrations do not meet your expectations.**

- There is no one single portal through which I can access all digital public services
- The public services are not all fully digitised. I have to interact with the public administrations through other channels, e.g. phone, mails, post, physical presence.
- I have no trust that my transaction and personal data will be secured
- Published information is not complete, not concise enough, outdated or irrelevant
- I 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
- I do not get enough support from public administrations while using digital public services
- I have to submit, although electronically, my personal data many times when using different digital services
- I have to use different ways of authenticating myself for the different digital services I am 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

3.2 Assessment of needs and problems at cross-border level

The following set of questions will address [interoperability at cross-border level](#), i.e. between citizens and public administrations that are not located in the same country.

***Q4. Have you had the need to interact with public administration(s) located in another country than your own during the last year?**

- Yes
- No

***Q5. How often have you used the digital public services provided by other EU countries' administrations during the last year?**

- Never used
- Rarely used
- Occasionally used
- Frequently used
- Always used
- Don't know / No opinion

***Q6. How likely is it that you would prefer using digital public services provided by other EU countries' administrations instead of other means (e.g. post, phone calls, physical presence)?**

- Not at all likely
- Rather not likely
- Neither likely nor unlikely
- Rather likely
- Very likely
- Don't know / No opinion

***Q7. To what extent do digital public services provided by other EU countries' administrations meet or exceed your expectations?**

- Far below my expectations
- Slightly below my expectations
- Meet my expectations
- Slightly above my expectations
- Far above my expectations
- Don't know / No opinion

4. Accompanying document

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 ISA²), 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.

Q8. Please feel free to express any further comment that you may have on the draft revised EIF text.

I agree with the Free Software Foundation Europe's conclusion on the current draft:

The draft revision lacks the understanding of national success stories, and of the barriers some of its points can create to achieve better interoperability that in the end will result in even more disparities between member states.

In particular, while the draft promotes "open specifications", the harmonised use of certain models and tools (e.g. EIRA), it can hamper its core principles with the inclusion of FRAND licensing terms, and abandoning the principle of "openness": the idea of collaborative efforts and a common innovative space.

It also completely disregards the obvious correlation between strong promotion of Free Software and higher interoperability which is evident from several NIF across Europe

In order to overcome these shortcomings, the EIF needs to learn from the best and promote solutions that have been proved successful. In particular:

The promotion of open specifications cannot be hampered by FRAND licensing terms;

The idea of openness, as in collaborative innovation, should be reintroduced as the core principle of the EIF;

Free Software which is a key enabler of interoperability need to be acknowledged and promoted at least as a reference implementation of technical standards.

The full comments on the revision of the European Interoperability Framework can be found on <https://fsfe.org/activities/os/eif-v3.en.html>

Kind regards

Contact

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