



# 1. Registration

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**\* Surname:**

Kiewitt

**\* Name:**

Pamela

**\* Email address:**

pam@trauco.com

**\* What is your nationality?**

- Austria  Belgian  British  Bulgarian  Croatian  Cypriot  
 Czech  Danish  Dutch  Estonian  Finnish  French  
 German  Greek  Hungarian  Icelandic  Irish  Italian  
 Latvian  Liechtenstein  Lithuanian  Luxembourg  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
- 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- Please keep my contribution confidential.** (it will not be published, but will be used internally within the Commission)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. 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.

### 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

**\* Which digital public services have you used the most frequently?**

Tax and personal records, my city's local services (courses, school)

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

Identification to those services can only be done from supported platforms, in my case, I use Linux but cannot use a Linux electronic identification, so I have to use the android version.

**\* 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

**\* 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

## 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

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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.

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

In section "Openness of formalised specifications,": I don't understand this part, it's very ambiguous: "Intellectual property rights related to the specification are licensed on FRAND terms or preferably on a royalty-free

basis in a way that allows implementation in both proprietary and open source software."

I propose this instead:

"Intellectual property rights related to the specification are licensed preferably on a royalty-free basis in such a way that allows implementation in all open-source projects and in proprietary software, or on FRAND terms."

I think it is important to make FRAND compatible with all open source projects, and this should be apparent in the text.

Another section that needs revision is "2.1 Underlying principle 3: Openness and Transparency." The proposed text encompasses very well the need for transparency towards the citizens and between corporations but does not give a clear vision of what openness is, that is why I propose expanding the text with this phrasing from EIF v2.0, which makes clear that element-sharing is imperative to achieve openness:

"In the context of the EIF, openness is the willingness of persons, organisations, or other members of a community of interest to share knowledge and stimulate debate within that community, the ultimate goal being to advance knowledge and the use of this knowledge to solve problems."

## Contact

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