

7.3 ABCDE - ADMINISTRATION, BUSINESS AND CITIZENS' DATA EXCHANGES IN THE DOMAIN OF CASE MANAGEMENT (2016.24)

7.3.1 IDENTIFICATION OF THE ACTION

Type of Activity	Common Services
Service in charge	DG COMP
Associated Services	DG DIGIT DG MARE DG AGRI

7.3.2 EXECUTIVE SUMMARY

The ISA² Action "**ABCDE - Administration, Business and Citizens' Data Exchange in the domain of Case Management**" aims at providing interoperable solutions to support data exchanges between the European Commission, Member States' administrations, business and citizens in the domain of Case Management.

Case Management in the context of this ISA² Action comprises Competition policy in the European Union, that is to say the enforcement of the Antitrust / Cartel rules, Merger control as well as State aid control⁷⁴.

Data exchange processes in Case Management are cross-border: they rest upon intense co-operation between the European Commission and the Member States⁷⁵, where information systems are prone to reusability at European and international level⁷⁶. Data exchanges cover various entities, such as Member States administrations and undertakings (including law firms) located within the EU or even outside of the EU.

Data exchange processes in Case Management are cross-sector, covering: Fisheries, Agriculture, Energy and Environment, Information, Communication and Media, Financial services, Basic Industries and Manufacturing, Pharma and Health services, Transport, Post and other services.

ABCDE has three packages:

i. **Operation and improvement of existing common services**

Operation and improvement of existing cross-border or cross-sector common services (established under ISA or IDABC), serving EU interests and under the umbrella of ABCDE, namely:

⁷⁴ Potentially extensible to any sector and policy area carrying out dossier-centric and data exchange-intensive administrative services or investigations.

⁷⁵ In Antitrust, the European Commission and the National Competition Authorities (NCAs) enforce the same rules of law and coordinate their action through the European Competition Network (ECN). In Merger Control, the European Commission and the NCAs may refer cases to one another. In State aid control, enforcing the rules has become a shared responsibility between the European Commission and Member States following the State aid modernisation.

⁷⁶ This stems from the fact that (i) European and National authorities enforce the same or similar rules of law, and (ii) the business processes involved are similar.

- a. GENIS (suite of common services for State aid).
- b. ECN2.
- c. COMP eTrustEx.
- d. eQuestionnaire.

ii. **Development and operation of new ABCDE common services**

Development and operation of new cross-border or cross-sector common services serving EU interests, namely:

- a. eRFI⁷⁷. Common service to support requests for information, sector inquiries and market investigations, to replace the ageing eQuestionnaire⁷⁸. One National Competition Authority has already manifested their interest in reusing this common service. The European Competition Network could be used to promote its reuse among other authorities.
- b. eLeniency. Common service to support the European Commission's immunity and leniency programme in Cartel investigations. As eRFI, eLeniency is potentially reusable by National Competition Authorities of the Member States to support their national immunity and leniency programmes.
- c. eConfidentiality. Common service to support confidentiality negotiation of case files with the investigated undertakings.

iii. **Establishment of a common ABCDE architecture / framework**

The common ABCDE architecture / framework will ensure the long-term sustainability of the ABCDE interoperable solutions by maximising synergies and economies of scale, reducing operation, improvement, change and development costs.

7.3.3 OBJECTIVES

The mission of ABCDE is to contribute to a better functioning of the internal market in the benefit of consumers, businesses and the European economy as a whole, thus endorsing European Union's political priorities such as the Digital Single Market, the Energy Union or a sanitised and stable Financial Services sector.

In the context of scarce resources in public administrations, the main objective of ABCDE is to reduce costs and gain efficiency and efficacy in the enforcement of Competition policy by the European Commission and the Member States' administrations, while ensuring good governance. This will be achieved at different levels:

- ABCDE will help reducing costs by implementing and operating common e-services used by the European Commission and the Member States' administrations to jointly enforce European and National competition law, thus avoiding disparate IT investments by the EU Member States' administrations. The common services are: SANI2, ECN2, SARI, Transparency Data Collection, Recovery Calculator, State Aid Collaborative Platform.

⁷⁷ During the preliminary analysis of eRFI, we analysed EUSurvey as a potential candidate. Given the wider scope of eRFI requirements which includes: knowledge base management, security constraints (e.g. Non-Repudiation), integration with Case Management back-ends, strong analytics capabilities, the preferred option was to develop eRFI. However we intend to leverage the existing know-how of EUSurvey, by observing its implementation approach (as 'lessons learned').

⁷⁸ The scope of eQuestionnaire was recently extended to cover not only Merger but also Antitrust and State Aid policy instruments. As a critical application it will be maintained and evolved until the release in Production of eRFI in 2020.

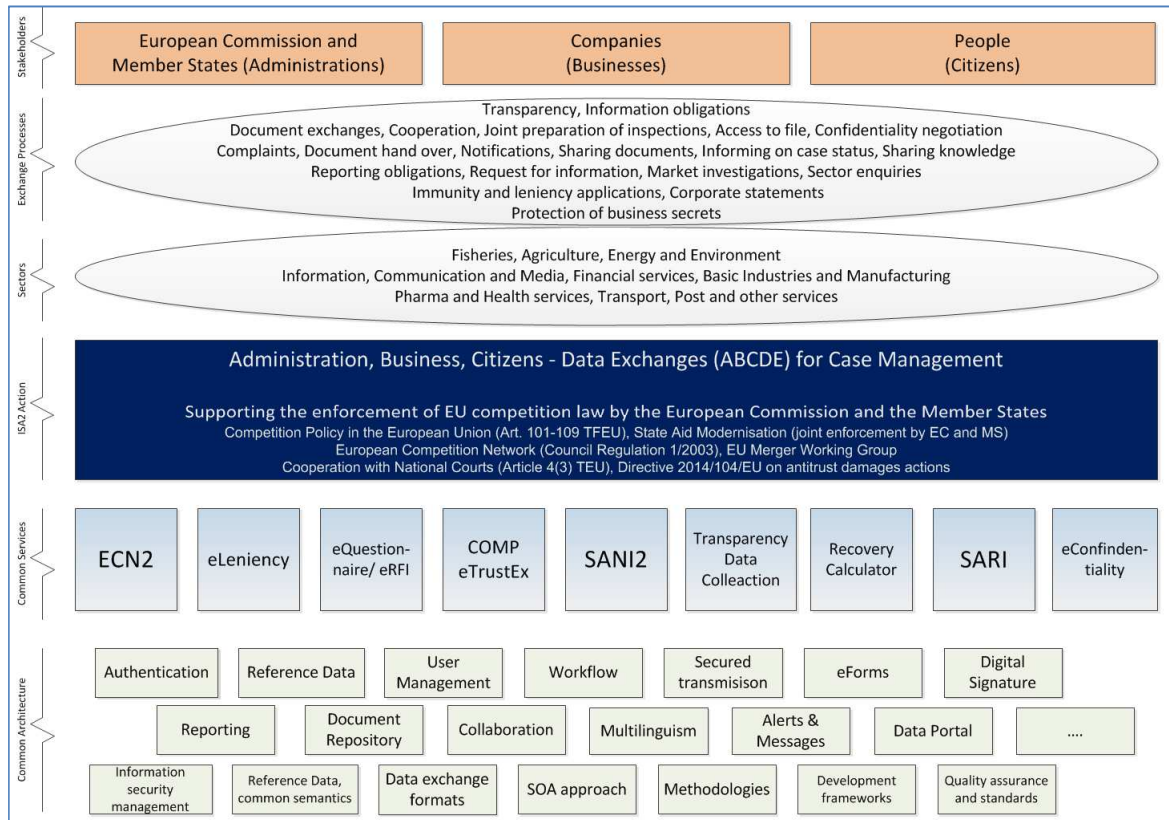
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- ABCDE will make data exchanges in Case Management faster, more effective and cost-efficient, by implementing and operating efficient interoperable e-services benefiting both the main users and key stakeholders (European Commission services, Member States' administrations, business and citizens).
 - ABCDE will promote the use and exchange of semantically consistent and highly qualitative data across European information systems in the Competition policy domain, fostering cross-sector and European-level interoperability.
 - ABCDE will reduce costs by implementing a common architecture / framework aiming at maximising synergies and economies of scale and reducing operation, improvement and development costs, ensuring the long-term sustainability of the ABCDE common services.
 - ABCDE shall further help reducing costs by implementing and operating common services that can be reused by Member States' administrations (confirmed interest in re-using eRFI by already one NCA, potential of reusability of eLeniency). The ABCDE common architecture / framework (partially or as a whole) has also a high potential of reuse by Member States' administrations.

7.3.4 SCOPE

ABCDE covers the cross-border and cross-sector data exchange processes with or among EU and Member States' administrations, business and citizens in the domain of Case Management, which are not covered by the European Commission's Case Management Rationalisation project (CMR)⁷⁹. Case Management in the context of the ISA² Action comprises the Competition policy of the European Union as well as State aid control in all sectors including Fisheries and Agriculture. Case Management is potentially extensible to any policy area carrying out dossier-centric and data exchange-intensive administrative services or investigations. Commission's backend processes and internal exchanges (i.e. between Commission's departments and services) are out of scope of ABCDE.

The overall scope of the ISA² Action ABCDE is visualised in the diagram below.

⁷⁹ The CMR project focuses on backend case management processes: document and record management; case handling and orchestration; case portfolio management; case team collaboration; e-discovery and evidence management etc.. European Commission Services participating to the CMR project are: DG COMP, DG TRADE, DG AGRI, DG MARE, OLAF.



The scope is defined in three packages:

Package I) Operation and improvement of existing common services

In scope:

Operation and improvement of existing cross-border or cross-sector common services established under ISA or IDABC, serving EU interests, namely:

GENIS (ISA Action 1.11) common services: SANI2, SARI, State Aid Transparency Data Collection, Recovery Calculator, State Aid Collaborative Platform, State Aid Portal, used by DG COMP, DG AGRI, DG MARE and the Member States' administrations of the 28 Member States to support the implementation of EU State Aid rules (Art.107 to 109, [Treaty on the Functioning of the European Union](#) (TFEU)).

ECN2 (ISA Action 2.9 - COMP Pilot) common service to support the European Competition Network (ECN), formed by DG COMP and the National Competition Authorities of the 28 Member States to share case information and case documents, supporting the implementation of Competition policy of the EU in particular Antitrust/Cartels investigations and Mergers control (Art. 101 to 106, TFEU and Merger Regulation 139/2004). ECN2 also supports exchanges between ECN and administrations of EFTA⁸⁰ countries. ECN2 improvements will support

⁸⁰ The European Free Trade Association (EFTA) is an intergovernmental organisation set up for the promotion of free trade and economic integration to the benefit of its four Member States: Iceland, Liechtenstein, Norway, and Switzerland.

document sharing and collaboration between the European Commission and the National Courts of EU28, will support the implementation of the Damages Directive⁸¹, will offer e-signature capabilities and adapt to any updates in the ECN legislation expected in the medium term.

COMP eTrustEx⁸² (ISA Action 1.8 - COMP Pilot) common service used by DG COMP, businesses (companies, law firms) and Member States' administrations to exchange large volume of sensitive documents in a secure way. COMP eTrustEx greatly supports the implementation of Competition policy of the EU.

eQuestionnaire (IDABC Action) common service used by DG COMP and businesses (companies, law firms) to request and provide structured information (requests for information, sector inquiries, market investigations) for case investigations. This tool is used cross-sector in Mergers control, Antitrust/Cartel investigations and State aid control.

Package II) Development and operation of new ABCDE common services

In scope:

Development and operation of new cross-border or cross-sector common services serving EU interests and in the scope of ABCDE, namely:

eRFI. Common service to support requests for information, sector inquiries and market investigations. eRFI will replace the ageing eQuestionnaire (developed under IDABC and in Production since 2009).

eLeniency. Common service to support the European Commission's leniency programme in Cartel investigations. Currently, the exchange process with businesses that is submitting leniency applications to the Commission is not IT-supported; hence it is human resources-consuming. eLeniency would be reusable by National Competition Authorities of the Member States to support their national leniency programmes.

eConfidentiality. Common service to support the confidentiality negotiation of case files with the investigated undertakings (businesses). Currently, this exchange process with businesses is not IT-supported, hence it is human resources-consuming.

Package III) Establishment of a common ABCDE architecture / framework

In scope:

The common ABCDE architecture / framework will ensure the long-term sustainability of the ABCDE interoperable solutions by maximising synergies and economies of scale and reducing operation, improvement, change and development costs. The common ABCDE architecture / framework will focus on:

- Common information security management.
- Common business and Service Oriented Architecture (SOA) approach.

⁸¹ Directive 2014/104/EU on antitrust damages actions.

⁸² Covers the evolution and maintenance of the modules specially developed and used by DG COMP (GUI, adapter, COMP back-end interoperability layer). Maintenance of DIGIT's eTrustExchange platform itself is out of the scope of this action and will be financed by another ISA² action.

- Common interoperability: Common technical approach, common semantics, common specifications and standard exchange formats, common security implementation.
- Common methodological approach: PM2⁸³, development methodologies.
- Common development frameworks and stacks.
- Common quality assurance approach and standards.

The common ABCDE architecture will operate and improve the reusable building blocks developed under ISA 1.11 GENIS and under ISA 2.9 DRS / ECN2 Pilot. The common ABCDE architecture / framework will be aligned to EIRA and EIC⁸⁴, being potentially reusable in any similar context (sector, policy area, national administration) dealing with a large set of complex data exchange processes with external stakeholders that have to interoperate with both backend systems and external systems. ABCDE re-usable components will be published on EIC.

7.3.5 PROBLEM STATEMENT

Problems and needs addressed by Package I) Operation and improvement of existing common services
<p>Problems:</p> <ul style="list-style-type: none"> • IT solutions supporting EU legislation could be either implemented in each of the 28 Member States or with one common service used by all. The former would imply disparate expenditures by Member States multiplying IT solutions' developments and operations, as well as a number of disparate systems hardly interoperating with each other. The use of common services is the de-facto approach in the ABCDE context, being significantly more cost-efficient and more effective (interoperability, use/reuse and exchange of data). • Data exchanges –typically ruled by tight legal deadlines– are often carried out in an inefficient and time-consuming way (e.g. delivery of documents by e-mail or in (encrypted) DVDs or paper documents delivered by mail service). • Ongoing legislation changes requiring adaptations to underlying IT solutions.
<p>Resulting needs:</p> <ul style="list-style-type: none"> • Need to operate existing cross-sector interoperable common services used by the European Commission and the administrations of the 28 Member States to jointly implement EU legislation: SANI2, ECN2, SARI, Recovery Calculator, State aid Transparency Data Collection and the State Aid Collaborative Platform. • Need to operate existing cross-sector interoperable common services used by the EC, the administrations, the business and citizens to further support secured and efficient data exchanges required by EU legislation: eTrustEx and eQuestionnaire. • Need to improve/adapt, e.g. upon legislation change, existing cross-sector interoperable common services in the interest of the EU.

⁸³ PM2 is the project management methodology of the European Commission.

⁸⁴ [European Interoperability Reference Architecture \(EIRA\)](#) and [European Interoperability Cartography \(EIC\)](#).

Problems and needs addressed by Package II) Development and operation of new ABCDE common services
<p>Problems:</p> <ul style="list-style-type: none"> • Recurrent and critical data exchange processes are currently carried out without IT support, being very resources-intensive. This is unbearable in the current situation of limited staff and resources in public administrations in the EU. • Data exchanges –often ruled by tight legal deadlines– are often carried out in an unsecured, inefficient and time-consuming way (e.g. delivery of paper documents by mail service). Developing common services addressing this problem is in the benefit of the European Commission, the Member States administrations, the businesses and citizens. • The European Commission and the Member States enforce, at different levels, similar legislation in the ABCDE context. IT solutions supporting similar data exchange processes at EU and national level could lead to disparate expenditures by Member States multiplying IT solutions' developments and operations.
<p>Resulting needs:</p> <ul style="list-style-type: none"> • Need to provide state-of-the-art IT solutions to support recurrent and critical data exchange processes in a more effective and cost-efficient way: "do more with less". This is the case for eLeniency and eConfidentiality. • Need to develop and operate new cross-sector interoperable common services used by the EC, the administrations in the Member States, the business and citizens to support secured and efficient data exchanges required by EU legislation: eLeniency, eConfidentiality and eRFI. • Need to develop IT solutions supporting data exchanges for Case Management that are prone to reusability at European and national level. One National Competition Authorities have already expressed his interest in reusing the eRFI solution if such is developed under ISA² (or launch their own development otherwise). The European Competition Network could be used as a platform to present this solution to other National Competition Authorities.

Problems and needs addressed by Package III) Establishment of a common ABCDE architecture / framework
<p>Problems:</p> <ul style="list-style-type: none"> • Lacking a well-defined common architecture / framework would lead to different projects being implemented conform to ISA² each, however architecturally different. This would result in increasing costs increasing over time, eventually resulting in the unsustainability of maintenance and operation of the ABCDE domain's common services. • A distinct information security management by project (i.e. not having a global security strategy and implementation common for the ABCDE domain) would be not only expensive but would also imply a high risk of incoherence in the security implementation of interoperability, resulting inevitably in security vulnerabilities. • Insufficient usage of standard exchange formats in the context of data exchanges in Case

Management in the EU, resulting in reduced interoperability and higher costs for data exchanges.
<p>Resulting needs:</p> <ul style="list-style-type: none"> • Need of a common ABCDE architecture / framework, aligned with EIRA and EIC, focusing on common SOA approach (business architecture, interoperability), common semantics, common specifications and standard exchange formats, common security implementation, aiming at maximising synergies and economies of scale and reducing operation, improvement, change and development costs. • Need for a common, global information security management covering all data exchanges in Case Management. • Need for identifying existing or defining new standard data exchange formats in the context of data exchanges in Case Management in the European Union.

7.3.6 EXPECTED BENEFICIARIES AND ANTICIPATED BENEFITS

Beneficiaries	Anticipated benefits
European Union as a whole: Institutions, Member States, businesses and citizens	<p><u>Effective enforcement of EU competition law (Art. 101-109 TFEU)</u></p> <ul style="list-style-type: none"> • State-of-the-art common e-services for efficient data exchanges in Case Management will result in a more effective enforcement of EU competition law by the European Commission and the Member States, leading to: <ul style="list-style-type: none"> ○ A better functioning of the European Single Market. ○ Better services and products, more choices, and better prices for European consumers. ○ More competitive European business better placed in the global economy. • The quantified customer benefits resulting from antitrust (including cartels) and merger decisions in 2014 were estimated above €3.8 billion⁸⁵. In 2014, the European Commission imposed €1.7 billion in fines related to cartel decisions, €0.5 billion in fines related to antitrust decisions, and imposed recoveries of €301 million of illegal State aid. Revenues from antitrust and cartel fines reduce the Member States' contributions to the EU budget. • At national level, the successful enforcement of Competition law brings similar benefits.
European Commission, Member States and businesses	<p><u>Concrete cost savings derived from the common use (by the Commission and Member State administrations) of common ABCDE e-services</u></p> <ul style="list-style-type: none"> • ABCDE common services are used by the European Commission and Member States' administrations to jointly implement EU legislation: SANI2, ECN2, SARI, State aid Transparency Data Collection and the State Aid Collaborative Platform. • The provision and operation of central e-services jointly used by Member States and the European Commission translates in concrete cost savings, since Member

⁸⁵ Page 26 on: http://ec.europa.eu/atwork/synthesis/aar/doc/comp_aar_2014.pdf

	<p>States do not need to engage in significant investments to develop, operate and evolve their own information systems.</p> <ul style="list-style-type: none"> ○ Example: with the implementation of a common service to comply with the Transparency provisions in State aid legislation entering into force by 1st July 2016, 25 Member States will not need to develop their own State aid Transparency Data Collection system. A conservative estimation of €250.000 costs to develop such a system at national level result in savings of more than €6 million, to which operation, maintenance and evolution costs have not been counted. ○ Similarly, the savings of providing and operating ECN2, a common service used by the European Competition Network (ECN) to jointly enforce Antitrust/Cartels rules can be estimated as high as €15 million⁸⁶. <ul style="list-style-type: none"> ● The provision and operation of central e-services (versus many disparate systems) will also significantly reduce the implementation costs of interoperability and foster cross-sector and European-level interoperability.
European Commission, Member States	<p><u>Concrete cost savings derived from a common ABCDE architecture / framework</u></p> <ul style="list-style-type: none"> ● Implementing common functionality in re-usable components and following a coherent architecture / framework common to all ABCDE common services shall significantly reduce development and operation costs. E.g. the savings on the State Aid Transparency Data Collector by re-using GENIS components can be estimated in at least €0.5 million⁸⁷. This estimation can be extrapolated to future systems as eRFI, eLeniency and eConfidentiality. ● The common ABCDE architecture / framework will foster cross-sector and European-level interoperability by establishing and spreading common domain semantics, specifications and standard exchange formats. ● The common ABCDE architecture / framework could be potentially reused in any similar context (sector, policy area, national administration) dealing with a large set of complex data exchange processes with external stakeholders that have to interoperate with both backend systems and external systems.
Member States	<p><u>Potential cost savings resulting from the re-use of ABCDE common services by Member States' administrations</u></p> <p>Similar exchange processes take place both at European and national level. Implementing e-services that can be re-used by Member States translates in potential cost savings. Some examples:</p> <ul style="list-style-type: none"> ● Requests for Information are carried-out both by the European Commission and the National Competition Authorities. The cost of implementation of eRFI as e-service supporting this process is estimated in €0.75 million (see section 1.1.12). Following high-level estimations, each potential re-use of this common service by a national administration could result in savings of approximately €1 million⁸⁸;

⁸⁶ Based on 28 x €550.000 costs of development of ECN2 v1.0.

⁸⁷ The cost of analysis and implementation of GENIS re-usable components (User Management, Reference Data, Multilingual, Forms and Audit Trail) was estimated in €1.1 Million in ISA Work Programme 2015 (approximately €220k per component). The savings link to reusing four of these components in State Aid Transparency Data Collector can be estimated in at least €0.5 million (220k per component multiplied by 4 minus integration costs).

⁸⁸ The implementation cost of eRFI is estimated in €0.6 million (see section 1.1.12). This amount doesn't include the cost of implementation of the different components that it will be reusing (estimating 4 components with an individual cost of €220k). Adding these amounts, the implementation

	<ul style="list-style-type: none"> Member States also implement leniency programs in Cartels investigations, making the eLeniency common service potentially re-usable. Following similar estimation calculations, each potential reuse of this common service by a national administration could result in savings of approximately €0.7 million⁸⁹;
European Commission, Member States and businesses	<p><u>Cost savings derived from automation of exchange processes</u></p> <ul style="list-style-type: none"> Several data and document exchange processes in Case Management (foremost the negotiation of confidentiality) still imply heavy manual intervention by European administrations and businesses' staff (e.g., case support and the Registries) as well as the use of costly postal services (e.g. DHL). Automating these processes will reduce the cost and manpower required to carry them. Concrete savings to be estimated. Member State representatives for the European Competition Network come to Brussels several times a year (more than 20 in 2014) to participate in ECN Advisory Committees and sign the Advisory Committee Opinion document. The implementation of electronic signature in ECN2 would allow the Advisory Committee Opinion document to be signed remotely facilitating Advisory Committee meetings to be hold per videoconference. This would result in minimising delays in the procedure and will reduce travel and accommodation costs. Concrete savings to be estimated.
European Commission, Member States and businesses	<p><u>Efficiency gains derived from automation of exchange processes</u></p> <ul style="list-style-type: none"> eRFI will give respondents to market investigation the ability to delegate and collaborate in answering to the Requests for Information (e.g. involving different actors: legal department, departments, CEO, etc.) that will save companies and citizens valuable time, increasing response rates to European Commission's market investigations. European administrations make extensive use of Requests for Information (RFIs) every year. In 2013, only in DG COMP, 14.394 RFIs were sent out in the context of 86 competition cases. eConfidentiality will make the confidentiality negotiation process (the most time consuming activity in the processes for parties' access to file and publication of final decisions) more resource-efficient and in a shorter delay by significantly speeding up the exchanges and facilitating the number of validation checks, allowing a faster registration, et cetera. eLeniency will make the leniency request process more resource-efficient and in a shorter delay, by reducing administrative tasks and streamlining the process for external businesses. Taking into account that currently one Case Assistant handles almost 200 oral corporate statements each year, the automation of this process will significantly reduce the time needed for the administration to complete corporate statements and help decreasing the overall case duration freeing resources of the European Commission to carry out more Cartel and antitrust investigations.

of a similar system from scratch by a Member State could reach €1.48 million. If we estimate that tailoring eRFI for the Member State could cost 33% of the total amount (€0.49 million), the reusability of the solution for one Member State could mean almost €1 million savings.

⁸⁹ For eLeniency the cost of implementation €370k and estimating that the service will reuse 3 common components.

European Commission and businesses	<p><u>Enhanced security in the manipulation, transmission and storage of sensitive information.</u></p> <p>The European Commission has an obligation of professional secrecy to protect confidential data of the business that it receives in its investigations.</p> <ul style="list-style-type: none"> • By substituting the usage of non-automated means (fax, mail post, etc.) inadvertent document disclosures will be minimised. • The common ABCDE architecture / framework will comprise a common, coherent information security management and technical implementation for all ABCDE common services. This will significantly improve the security of data exchanges in this domain.
European Commission, Member States, businesses and citizens	<p><u>More transparency toward EU citizens</u></p> <ul style="list-style-type: none"> • Consumers and companies in the EU will benefit from having more accessible and easily comparable information on support granted by national authorities to beneficiaries of State aid, thus increasing the awareness of the business and Member States on aid measures. • Improving collaboration between the European Commission and EU28 National Courts will allow a better overview of sectorial trends/focus on infringements cases at national level and increase transparency across the EU on competition cases both for business and for the administration.

7.3.7 RELATED EU ACTIONS / POLICIES

Action / Policy	Description of relation, inputs / outputs
<p><u>Competition Policy in the European Union:</u> the European Commission, together with the National Competition Authorities, directly enforces EU Antitrust and Cartels rules (Art. 101-106 TFEU), to make EU markets work better, by ensuring that all companies compete equally and fairly on their merits. This benefits consumers, businesses and the European economy as a whole.</p> <p>EU competition policy is a key enabler to several priority policies defined in the European Commission agenda:</p> <ul style="list-style-type: none"> • Jobs, Growth, Investment and Competitiveness, • Digital Single Market, • Energy Union. 	<p>The outcome of ISA² Action ABCDE will make data exchanges in Case Management faster, more effective and cost-efficient for both the main users of interoperable solutions (European Commission services and Member States' administrations) and the addressed stakeholders (other Member States' administrations, business and citizens).</p> <p>→ Package I) Operation and improvement of existing common services</p> <p>→ Package II) Development and operation of new ABCDE common services</p> <p>→ Package III) Establishment of a common ABCDE architecture / framework</p>
<p><u>State Aid Modernisation:</u> The European Commission has completed by 2014 an in-depth</p>	<p>The common services developed under ISA 1.11 GENIS aim at offering the features and capabilities</p>

<p>reform of State aid control. It included the amendment of the Procedural Regulation, an amendment of the Enabling Regulation, a new <i>de minimis</i> Regulation, the new General Block Exemption Regulation, and the revision of sectorial guidelines. At the heart of State Aid Modernisation is a substantial shift of responsibility from the European Commission to the Member States for the control and implementation of State aid rules serving the Europa 2020 objectives. In return, the European Commission has introduced new transparency and ex-post evaluations requirements. The new legislation package also enables the use of sector inquiries and market investigations in State aid control, and streamlines the treatment of complaints. Finally, in order to achieve a coherent interpretation and implementation of the new legislation package across the EU, steady collaboration between the European Commission and the Member States will be set up.</p>	<p>necessary to support the State Aid Modernisation.</p> <p>The State aid common services are:</p> <ul style="list-style-type: none"> • SANI2, • SARI incl. scoreboard reporting, • Transparency Data Collection, • Recovery Calculator, • State Aid Collaborative Platform, • State Aid Portal. <p>These common services are used by the European Commission (DGs COMP, AGRI and MARE) and the Member States administrations.</p> <p>→ Package I) Operation and improvement of existing common services → Package II) Development and operation of new ABCDE common services → Package III) Establishment of a common ABCDE architecture / framework</p>
<p><u>European Competition Network (ECN):</u> the European Competition Network consists of the 28 competition authorities within the European Union and DG Competition. ECN jointly carries out the enforcement of European Antitrust/Cartels rules (Council Regulation 1/2003) and Merger rules (Regulation 139/2004).</p>	<p>ECN2, a common service developed under ISA Action 2.9, supports the exchange and sharing of case data and case documents between the European Commission and the Member States in a secured way, supporting the implementation of EU Antitrust law:</p> <ul style="list-style-type: none"> • European Competition Network (the Member States' National Competition Authorities plus the European Commission), • Application of Antitrust/Cartel law by National Courts, • Directive 2014/104/EU on antitrust damages actions.
<p><u>Application of Antitrust/Cartel law by National Courts:</u> the European Commission is committed to assisting National Courts pursuant Articles 101 and 102 TFEU in order to ensure the coherent application of those provisions throughout the EU. This builds on the mutual duty of loyal cooperation provided for by Article 4(3) Treaty on European Union (TEU).</p>	<p>→ Package I) Operation and improvement of existing common services → Package III) Establishment of a common ABCDE architecture / framework</p>
<p><u>Directive 2014/104/EU on antitrust damages actions:</u> the Directive removes practical obstacles to compensation for victims of infringements of EU antitrust law. The Directive applies to all damages actions, whether individual or collective, which are available in the Member States.</p>	
<p><u>Request for Information/RFI, market</u></p>	<p>RFI has been a key investigative technique in</p>

<p><u>investigations and sector inquiries:</u> in the context of Merger, Antitrust and State aid rules the European Commission may request information from the business and Member States whether it concerns undertakings or affected sectors of the economy. In 2013, only in DG COMP, 14.394 RFIs were sent out in the context of 86 competition law cases. In addition, among others, the following sectors have been subject to specific sector inquiries by the EC:</p> <ul style="list-style-type: none"> • E-commerce, • Pharmaceuticals, • Financial Services, • Energy, • Telecommunications, • Roaming, • Media. 	<p>merger and antitrust cases and is currently also part of the State aid investigations tools. Collected information is typically registered in the case file (becomes part of the investigation dossier) and plays a vital role in the decision making process of the European Commission (the regulator). RFIs are extensively used in Antitrust and Merger cases, have recurrently extremely tight deadlines (especially in merger cases) and face a steady increase of the volume of data and information received from respondents. A common service supporting this key process is of paramount importance for the enforcement of competition law in the EU. By 2020, eRFI shall replace the ageing eQuestionnaire (in production since 2009).</p> <p>→ Package I) Operation and improvement of existing common services</p> <p>→ Package II) Development and operation of new ABCDE common services</p> <p>→ Package III) Establishment of a common ABCDE architecture / framework</p>
<p><u>Negotiation of confidentiality claims:</u> the protection of confidential information as well as by the obligation of professional secrecy, which obliges the European Commission not to disclose information in its possession covered by the obligation of professional secrecy pursuant to Article 28 of Reg. 1/2003 and Art. 339 TFEU.</p>	<p>Negotiating confidentiality claims with investigated undertakings (businesses) generates substantial workload for case teams and should be dealt with as early as possible. These claims must be settled before the Statement of Objections is notified and access to file granted. eConfidentiality will support confidentiality negotiations of case files with the investigated undertakings.</p> <p>→ Package II) Development and operation of new ABCDE common services</p> <p>→ Package III) Establishment of a common ABCDE architecture / framework</p>
<p><u>Leniency Policy:</u> the leniency policy offers companies involved in a cartel - which self-report and hand over evidence - either total immunity from fines or a reduction of fines which the European Commission would have otherwise imposed on them. It also benefits the Commission, allowing it to lift the cloak of secrecy in which cartels operate and to obtain insider evidence of the cartel infringement.</p>	<p>The implementation the eLeniency common service will fulfil the protection and confidentiality needs of the external parties (businesses) and significantly reduce the use of resources of the European administrations implementing leniency programmes, and bring administrative savings in the Cartels investigations.</p> <p>→ Package II) Development and operation of new ABCDE common services</p> <p>→ Package III) Establishment of a common</p>

	ABCDE architecture / framework
<p><u>ISA Action 2.9 - Document Repository Services (DRS) for EU policy support:</u> DRS offers document management features as a service, with a strong focus on interoperability.</p>	<p>ECN2 is a common service developed under ISA 2.9 that uses Document Repository Services (DRS) as building block in order to implement document management capabilities. In the context of ABCDE actions, the usage of DRS as building block will be extended to any common service with document management requirements.</p> <p>→ Package I) Operation and improvement of existing common services</p> <p>→ Package III) Establishment of a common ABCDE architecture / framework</p>

7.3.8 REUSE OF SOLUTIONS DEVELOPED BY ISA, ISA² OR OTHER EU / NATIONAL INITIATIVES

ISA² Action ABCDE will establish a common component-based architectural approach for all the common services developed and operated under this action. This approach will be aligned with the European Interoperability Reference Architecture (EIRA) and be fully oriented to the re-usability and interoperability of building blocks. This strategy will be implemented by **Package III) Establishment of a common ABCDE architecture / framework** and will include the identification, re-use and integration of existing solutions in order to implement common business requirements. Some solutions developed by other initiatives that are already used by ABCDE common services:

European Commission Authentication Service (ECAS) is the common authentication service for web applications developed by DG DIGIT offering single sign-on between applications. ECAS will be the building block for authentication for all ABCDE common services (currently used in SANI2, COMP eTrustEx and ECN2).

Document Repository Services (DRS) is a set of reusable document management services developed by DG DIGIT.B2 under ISA Action 2.9. The maintenance and operation of DRS will be financed by ABCDE action and the budget sub-delegated to DG DIGIT.B2 who will be responsible for operating and evolving the component (see budget item Operation III.1 in the Section 1.1.12. Costs and Milestones). DRS will be analysed as potential building block for document repository for all ABCDE common services implementing such features. DRS is currently used in ECN2.

e-TrustEx platform is a platform for secure information exchange developed by DG DIGIT under ISA Action 1.8 which plays the role of interoperable mediator between the back-offices of exchange parties. eTrustEx will be analysed as potential building block for secure transmission and end-to-end encryption for ABCDE common services. This solution is already used in COMP eTrustEx and could be also adopted for new common services with this type of requirements.

Reference Data Deployment Agent (REDDA) is a reusable component being developed under ISA 1.1 supporting reference data governance, management and deployment. REDDA will be analysed as

potential the building block for reference data management and deployment for all ABCDE common services.

Apart from these components, ABCDE will operate, improve and re-use the building blocks developed under ISA Action 1.11 GENIS: **Multilingual**, **eForms**, **User Management** and Audit Trail, and under ISA Action 2.9 DRS COPM Pilot: **Messaging** and **Alerts & Subscriptions**.

7.3.9 EXPECTED RE-USABLE OUTPUTS (solutions and instruments)

Output name	State aid common services developed under ISA Action 1.11 – GENIS: <ul style="list-style-type: none"> • SANI2 • SARI (originally developed under IDABC) • Transparency Data Collection • Recovery Calculator • State aid collaborative platform
Description	These common services are used by the European Commission (DGs COMP, AGRI, and MARE) and the Member States' administrations to jointly implement State aid rules (Articles 107-109 TFEU).
Reference	https://webgate.ec.europa.eu/competition/sani2 https://webgate.ec.europa.eu/competition/sani/sari
Target release date / Status	<ul style="list-style-type: none"> • SANI2 and SARI incl. Scoreboard are in production. • Transparency Data Collection is under development. Production date (deadline fixed by the Legislation): 1 July 2016. • Recovery Calculator, State Aid Collaborative Platform are under development. Estimated production: Q4 2015.

Output name	ECN2: common service developed under ISA Action 2.9 – DRS (ECN2 Pilot).
Description	<p>ECN2⁹⁰ is used by the European Competition Network (European Commission and the National Competition Authorities) to jointly implement Antitrust/Cartels rules (Articles 101-102 TFEU): inform each other about the status of Antitrust cases, share related documents, prepare inspections.</p> <p>ECN2 is also used by the EU Merger Working Group as an efficient and secure means to exchange documents in Merger cases.</p> <p>ECN2 is also used as secure document sharing platform between European Commission and Member States' administrations to support the application of Antitrust/Cartel law by National Courts as well as the Directive 2014/104/EU on antitrust damages actions.</p>
Reference	URL will be made public in when ECN2 enters in production.
Target release date / Status	ECN2 target date for release in production is Q1 2016.

⁹⁰ ECN2 will replace in Q1 2016 the ageing systems ECN-I and ECN-ET currently (August 2015) used by the European Commission and Member States' National Competition Authorities.

Output name	New ABCDE common services with a potential of re-use by Member States administrations: <ul style="list-style-type: none"> • eRFI • eLeniency
Description	<ul style="list-style-type: none"> • Requests for information (incl. market investigations and sector enquiries) is a process equally applied by the European Commission and the National Competition Authorities in Competition law enforcement. Therefore there is a high potential of re-use of the eRFI common service. National Competition Authorities have expressed their intention to reuse the eRFI solution if such is developed under ISA², or launch their own development otherwise. • Immunity/leniency programmes are effective weapons in the fight against Cartels. They are implemented at European and National level. Therefore there is a high potential of re-use of the eLeniency common service.
Reference	URLs will be made public when common services enter in production.
Target release date / Status	<ul style="list-style-type: none"> • eRFI target date for production is Q1 2020. • eLeniency target date for production is Q1 2019.

Output name	Building Blocks developed under ISA Action 1.11 – GENIS: <ul style="list-style-type: none"> • Multilingual • eForms • User Management • Audit Trail
Description	<ul style="list-style-type: none"> • Multilingual: manages sets of translations in all European Commission languages in a central repository and offers these translations to different clients embedded in the user applications. • eForms: generic forms easily defined and maintained. • User Management: supports de-centralised authorisation (user and access rights management), e.g. delegating the management of Member State's users to a local administrator. • Audit Trail: reusable building block to provide audit trail support of the operations carried out in the common services with a harmonised approach. <p>These modules are completely decoupled as generic building blocks and are published for re-use.</p>
Reference	https://joinup.ec.europa.eu/asset/multilingual/home https://joinup.ec.europa.eu/asset/forms/home
Target release date / Status	Already operative in production and re-used by common services.

Output name	Building Blocks developed under ISA Action 2.9 – DRS (ECN2 Pilot). <ul style="list-style-type: none"> • Messaging
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	<ul style="list-style-type: none"> Alerts & Subscriptions
Description	<ul style="list-style-type: none"> Messaging: implements communications between users via messaging operations (send message, reply, archiving and content encryption). Alerts & Subscriptions: implements subscriptions and alert functionalities. Events are stored in a generic database model and a batch process sends alert notifications to users based on their event subscriptions. <p>Both modules will be completely decoupled as generic building blocks and will be published for re-use.</p>
Reference	Publication in JoinUp will follow.
Target release date / Status	Currently in acceptance, re-used by ECN2. Target released date in production is Q1 2016.

7.3.10 ORGANISATIONAL APPROACH

7.3.10.1 Expected stakeholders and their representatives

Stakeholders	Representatives
Package I) Operation and improvement of existing ABCDE common services	
GENIS State aid exchanges (SANI2, Transparency, State Aid Calculator, SARI, State Aid Collaborative Platform)	
Project Owner (PO)	Gert-Jan Koopman (COMP Deputy DG for State Aids)
Business Manager (BM)	Nicola Pesaresi (HoU COMP.A.3), Koen Van de Castele (HoU COMP.0.3) and Wolfgang Mederer (HoU COMP.H.4).
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Raül Romero Valls, Xavier Descamps (COMP.R.3)
DG AGRI User Representatives	Ludmila Hamtcheva, Maria Elisabete Dias Costa, Linas Visomirskis (AGRI.DDG4.I2)
DG MARE User Representatives	Cécile Ducatez (MARE.F.4)
Member States User Representatives	One representative per Member State attending the State Aid Working Group, chaired by COMP.A.3.
ECN2	
Project Owner (PO)	Eddy de Smitjer (HoU COMP.A.4)
Business Manager (BM)	Petra Krenz (COMP.A.4)
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Radu Tudose (COMP.R.3)
Member States User Representatives	One representative per Member State attending the European Competition Network Working Group, chaired by COMP.A.4
Other Stakeholders	DIGIT.B.2

COMP eTrustEx	
Project Owner (PO)	Sari Suurnakki (HoU COMP.R.1)
Business Manager (BM)	Vincent Maes (COMP.R.1)
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Radu Tudose (COMP.R.3)
Other Stakeholders	DIGIT.B.2, DIGIT.B.4
eQuestionnaire	
Project Owner (PO)	Julia Brockhoff (HoU COMP.A.2)
Business Manager (BM)	Christos Tsoumanis (COMP.A.2)
Solution Provider (SP)	Manuel Perez Espín (HoU COMP.R.3)
Project Manager (PM)	Attila Borguet (COMP.R.3)
Package II) Development and operation of new ABCDE common services	
eLeniency	
Project Owner (PO)	Eric Van Ginderachter (Director COMP.G)
Business Manager (BM)	Kevin Coates (COMP.G.1)
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Attila Borguet (COMP.R.3)
eConfidentiality	
Project Owner (PO)	Sari Suurnakki (HoU COMP.R.1)
Business Manager (BM)	Vincent Maes (COMP.R.1)
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Radu Tudose (COMP.R.3)
eRFI	
Project Owner (PO)	Julia Brockhoff (HoU COMP.A.2)
Business Manager (BM)	Christos Tsoumanis (COMP.A.2)
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Olivier Mungo (COMP.R.3)
Member States User Representatives	Representatives from the State Aid Working Group for exchanges in the context of State Aid, and representatives from the European Competition Network Working Group for exchanges in the context of Antitrust.
Package III) Establishment of a common ABCDE architecture / framework	
ABCDE common architecture / framework, building blocks	
Project Owner (PO)	Manuel Pérez Espín (HoU COMP.R.3)
Business Manager (BM)	Javier Vázquez Fernandez (COMP.R.3)
Solution Provider (SP)	Manuel Pérez Espín (HoU COMP.R.3)
Project Manager (PM)	Raül Romero Valls (COMP.R.3)
Other Stakeholders	DIGIT.B.1, DIGIT.B.6

7.3.10.2 Communication plan

Services under the ISA² Action ABCDE will implement the communication management process following the PM2 methodology and will participate to the different ISA² communication channels, working groups and events as appropriate. Some of the meetings taking place will be:

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- **Project follow-up and review meetings.** Chaired by the Project Manager and attended by the Business Manager and the Project Core Team, the project follow-up and review meetings aim to discuss the project progress, the identification of new risks and issues, the status of current and future deliverable and/or the testing progress among others. Depending of the project size they will be held on a monthly basis. The Project Progress Report shall support the meeting. Minutes of the meeting will be distributed by e-mail.
 - **Project Steering Committee meetings.** Chaired by the Project Owner, and attended by the Business Manager, Solution Provider and Project Manager, the project steering committee meetings aim at discussing key points meriting management attention (e.g. problems encountered and actions taken, evaluation of the project status with respect to the scope, plan and budget). Depending of the project size they will be held every three or six months. The Steering Committee Progress Report shall support the meeting. Minutes of the meeting will be distributed by e-mail.
 - **DIT⁹¹ meetings.** Chaired by a business Director and attended by project owners, business managers, IT and document management specialists. The DIT operates as DG COMP's IT Steering Committee and assures that the investments in IT are aligned with business needs and generate business value. The DIT coordinates the overall execution of the IT strategy and set priorities where necessary. DIT meetings are held monthly. Minutes of the meetings are distributed by e-mail.
 - **Working groups and participatory meetings with Member States representatives.** For the common services used by the Member States' administrations, the European Commission will hold several meetings per year in order to ensure the alignment of the common services with Member States' needs. IT trainings and Questions & Answers sessions will be organised in this context. Some samples of these meetings are the ECN Plenary meeting, EU Merger Working Group or the Transparency Steering Group. Appropriate channels of communication will be established with those Member State administrations interested in the reuse of common services.
 - **ABCDE - CMR Coordination meetings** will bring together representatives from the ABCDE action and Case Management Rationalisation (CMR) project, with the participation of DIGIT.B1 (Architecture Office). The purpose of these meetings will be to ensure architecture alignment and coherent SOA/interoperability approach between the two projects. The coordination meetings will be held quarterly. Minutes of the meeting will be distributed by e-mail.

⁹¹ DIT stands for Document handling and IT systems Group.

- **ABCDE - ISA² Coordination meetings** will bring together representatives from the ABCDE common architecture framework and ABCDE common services, with the participation of DIGIT.B6 (ISA Unit). The purpose of these meetings will be to ensure the alignment of the common ABCDE architecture framework with the European Interoperability Reference Architecture (EIRA). The meetings will be held quarterly. Minutes of the meeting will be distributed by e-mail.

7.3.10.3 Governance approach

The governance of ISA² Action ABCDE will have two dimensions: global governance of the action as a whole and governance of each common service under the umbrella of ABCDE. The governance model will be aligned with the European Commission IT governance and will follow recommended standards and methodologies.

The ABCDE global governance will follow the ISA² governance structures and reporting to ensure ISA² alignment of the project. The ABCDE action will also be steered and monitored by the DIT (see section X.1.10.2), to ensure its business alignment.

The architecture alignment of ABCDE with the Case Management Rationalisation project (CMR) and the European Interoperability Reference Architecture (EIRA) will be ensured by the ABCDE common architecture/framework sub-project.

Each ABCDE common service will implement a governance model based on PM2 methodology. The roles and responsibilities of the Project Owner and the Business Manager will be defined and each project will be steered by its Project Steering Committee (see table under section X.1.10.1). Each Project Steering Committees will bring together the different project stakeholders, and it will guide, promote, monitor and evaluate the successful execution of the project. The individual Project Steering Committees will report to the DIT.

7.3.11 TECHNICAL APPROACH

Package I) Operation and improvement of existing ABCDE common services.

The common services under Package I will be in operation phase throughout the duration of ISA² programme. The operation phases will comprise the improvements of these common services. The improvements will have two lines:

- improvements derived from new business request and legislation changes,
- step-wise alignment with the ABCDE common architecture / framework.

Package II) Development and operation of new ABCDE common services.

The common services under Package II will be implemented following PM2 and RUP@EC or Agile@EC methodologies⁹². The inception and execution phases of the different sub-projects will go

⁹² PM2 is the project management/lifecycle methodology of the European Commission.

RUP@EC and Agile@EC are software development methodologies of the European Commission.

hand-in-hand with the implementation of the common ABCDE architecture. The execution phases will benefit from the common architecture by re-using common artefacts and technologies. In order to make the execution phases more efficient, the inception phases of new common services could cover not only the definition of the Business Case and the Project Charter, but also the specification of the System Business Requirements and/or the implementation of an architectural Proof of Concept (PoC) if required..

Package III) Establishment of a common ABCDE architecture / framework.

The implementation of the common ABCDE architecture will take input from architectural analysis of the common services under Package I, and from the architectural analysis carried out during inception phases of the common services under Package II. Defining a common architecture in one unique analysis will avoid the repeated efforts and costs derived from each common service carrying out their own analysis about the appropriate re-usability of components, will provide a common guideline to implement interoperability and provide sustainability for all ABCDE common services. The ABCDE common architecture will also centrally manage the maintenance and evolution of the different common building blocks re-used by the services (User Management, Reference Data, Multilingual, Audit Trail, etc.).

Services – Management, coordination, QA, testing, support and hosting

In order to gain efficiency and save costs, several non-development activities will be centralised in a horizontal cell (see S.2) supporting all the ABCDE common services. This cell will cover the implementation of quality assurance and quality control independently from the development teams, will provide 2nd level user support to administrations and business and will support all development teams for configuration and deployment management.

Following the same approach, PMO activities will also be centralised in an horizontal cell (see S.1) in order to give support to the different project managers, enforce coordination and harmonization among all the ABCDE common services, establish common standards on project management and software development methodologies aligned with PM2, RUP@EC and Agile@EC, draft qualitative reporting for the central governance and ISA² bodies, and ensure communication with the ISA² Working Group.

7.3.12 COSTS AND MILESTONES

7.3.12.1 Breakdown of anticipated costs and related milestones

Phase: Inception Execution Operational	Description of milestones reached or to be reached	Anticipa ted Allocati ons (KEUR)	Budget line ISA ² / others (specify)	Start date (QX/YYYY)	End date (QX/YYYY)
Package I - Operation and improvement of existing ABCDE common services					
Operation I.1	GENIS (State aid common services)	3040	ISA ²	Q2/2016	Q4/2020
Operation I.2	ECN2	1475	ISA ²	Q2/2016	Q4/2020
Operation I.3	COMP eTrustEx	550	ISA ²	Q2/2016	Q4/2020

Operation I.4	eQuestionnaire	400	ISA ²	Q2/2016	Q3/2020
Package II – Development and operation of new ABCDE common services					
Inception II .1	eRFI	160	ISA ²	Q2/2016	Q1/2017
Execution II.1	eRFI	600	ISA ²	Q1/2017	Q4/2018
Closing II.1	eRFI	130	ISA ²	Q1/2019	Q2/2019
Operation II.1	eRFI	390	ISA ²	Q3/2019	Q4/2020
Inception II .2	eLeniency	70	ISA ²	Q2/2016	Q3/2016
Execution II.2	eLeniency	250	ISA ²	Q4/2016	Q2/2018
Closing II.2	eLeniency	50	ISA ²	Q3/2018	Q4/2018
Operation II.2	eLeniency	100	ISA ²	Q1/2019	Q4/2020
Inception II .3	eConfidentiality	170	ISA ²	Q2/2016	Q1/2017
Execution II.3	eConfidentiality.	300	ISA ²	Q2/2017	Q3/2018
Closing II.3	eConfidentiality	100	ISA ²	Q3/2018	Q4/2018
Operation II.3	eConfidentiality.	200	ISA ²	Q1/2019	Q4/2020
Package III – Establishment of a common ABCDE architecture / framework					
Inception III	ABCDE architecture	105	ISA ²	Q2/2016	Q4/2016
Execution III	ABCDE architecture	350	ISA ²	Q4/2016	Q2/2018
Closing III	ABCDE architecture	60	ISA ²	Q3/2018	Q4/2018
Operation III	ABCDE architecture	1985	ISA ²	Q2/2016	Q4/2020
Operation III.1	DRS operation	600	ISA ²	Q2/2016	Q4/2020
Services – Management, coordination, QA, testing, support and hosting for ISA ² Action ABCDE					
Operation S.1	Overall project management and support, PMO, ISA ² reporting, communication	990	ISA ²	Q2/2016	Q4/2020
Operation S.2	User support, QA, testing pool, etc.	1630	ISA ²	Q2/2016	Q4/2020
Operation S.3	Hosting DIGIT Data Center	1000	ISA ²	Q2/2016	Q4/2020
	TOTAL	14705	ISA ²		

7.3.12.2 Breakdown of ISA² funding per budget year

Budget year	Anticipated allocations (in KEUR)
2016	2335
2017	3350
2018	3320
2019	2920
2020	2780

Budget Year	Phase	Anticipated allocations (in KEUR)	Executed budget (in KEUR)
2016	Operation I.1	480	
2016	Operation I.2	255	
2016	Operation I.3	100	
2016	Operation I.4	180	
2016	Inception II.1	100	
2016	Inception II.2	70	
2016	Execution II.2	50	
2016	Inception II.3	120	
2016	Inception III	105	
2016	Execution III	80	
2016	Operation III	225	
2016	Operation III.1	120	
2016	Operation S.1	110	
2016	Operation S.2	240	
2016	Operation S.3	200	
2017	Operation I.1	640	
2017	Operation I.2	340	
2017	Operation I.3	150	
2017	Operation I.4	80	
2017	Inception II.1	60	
2017	Execution II.2	200	
2017	Inception II.3	50	
2017	Execution II.3	200	
2017	Execution III	220	
2017	Operation III	440	
2017	Operation III.1	120	
2017	Operation S.1	220	
2017	Operation S.2	280	
2017	Operation S.3	200	
2018	Operation I.1	640	
2018	Operation I.2	340	
2018	Operation I.3	100	
2018	Operation I.4	80	
2018	Execution II.1	400	
2018	Execution II.2	50	
2018	Closing II.2	50	
2018	Execution II.3	100	
2018	Closing II.3	100	
2018	Execution III	50	

2018	Closing III	60	
2018	Operation III	440	
2018	Operation III.1	120	
2018	Operation S.1	220	
2018	Operation S.2	370	
2018	Operation S.3	200	
2019	Operation I.1	640	
2019	Operation I.2	340	
2019	Operation I.3	100	
2019	Operation I.4	80	
2019	Closing II.1	130	
2019	Operation II.1	130	
2019	Operation II.2	50	
2019	Operation II.3	100	
2019	Operation III	440	
2019	Operation III.1	120	
2019	Operation S.1	220	
2019	Operation S.2	370	
2019	Operation S.3	200	
2020	Operation I.1	640	
2020	Operation I.2	200	
2020	Operation I.3	100	
2020	Operation I.4	80	
2020	Closing II.1	50	
2020	Operation II.1	260	
2020	Operation II.2	50	
2020	Operation II.3	100	
2020	Operation III	440	
2020	Operation III.1	120	
2020	Operation S.1	220	
2020	Operation S.2	370	
2020	Operation S.3	200	
	TOTAL	14705	

7.3.13 ANNEX AND REFERENCES

Description	Reference link	Attached document
Please refer to ISA Actions having a follow-on by ISA ² Action ABCDE: <ul style="list-style-type: none"> ISA 1.11 GENIS ISA 1.8 eTrustEx (COMP Pilot) 	ISA Work Program 2015	

• ISA 2.9 Document Repository Services (COMP Pilot)		
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