

MORAIS BISMARQUE GASPAR Ana Gloria

From: NILSSON Tina
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Tina

Skickat från min iPhone

Vidarebefordrat brev:

Från: Xavier Dutoit [REDACTED]

Datum: 31 mars 2014

Till: [REDACTED]

Ämne: ECI

Dear Tina,

I was the technical director for the right 2 water ECI. I have been involved with promoting the ECI for several in that capacity, or simply because as a swiss citizen, I might have a different expectation of what direct democracy means. I am one of the two persons that know and have managed their own instance of OCS, and have learnt about its problem more than I wished to.

Please consider the interview (attached) I made recently as my contribution about the ECI and what could be improved.

Two points I want to highlight

1) security and privacy

In a nutshell, the way the software implemented the technical directive neither improve the security and privacy of the private data of the citizen, but I'd argue that it even weaken it.

For instance, it isn't possible to test the software without having to share the most private information (the key to login), the same key that you are forced to provide for the most mundane tasks (eg. updating the number of signatories on the campaign website) is the same protection to decrypt all the signatures and get all the IDs. Usability matters in security. By making a software almost impossible to use for the admin, they are pushing them to follow bad practices, like leaving the key or admin accounts on a file on their computer or written on a post it on they keyboard.

Moreover, the OCS software isn't protecting the private data when they are the most at risk: after the end of the campaign to send them to the 28 member state.

And despite all these, we had some of the signatories that OCS stored unencrypted on the server (that is explicitly forbidden by the directive).

I have written various articles about the technical problems we encounters, and about the major issues on the process to develop the software. Could you consider them for inclusion?

<http://tttp.eu/news/fubar>

http://tttp.eu/news/eci_theater

These article addresses as well the other main issue:

2) the software isn't genuinely open source

I have been working on open source projects since the past 15 years and I've won award and spoke on that topic at various events. I'm involved in several open source projects on campaigning -for instance civicrm, that has a petition system that offers features not unlike what the OCS provides-.

The development process from the European Commission for the OCS fails to implement the best practices for open source projects. In two years, they failed to provide the source code in a timely fashion, failed to listen to the community, failed to communicate what was working on and failed to credit the external contributions.

On that topic, I would want to make a formal complain, as the last 4 versions of the OCS software aren't open source anymore:

The current version is 1.5, but its source code isn't publicly released

<https://joinup.ec.europa.eu/svn/ocs/>

Two years ago, the EC said in a meeting that they would switch and publish the source code they were working on before the summer. It is still not done, despite being a trivial task of a few minutes.

For all the previous versions, I had to ask and argue to get access to the latest source code. Is IS NOT what open source is about. Access to the code and transparency on what is worked on is a key part of the process, not an afterthought that you can skip is no one complains.

And now, they don't even publish the source code of the latest version. Would it be possible to exchange briefly with you about the process and opportunity of a formal complain?

Lastly, I would be available to clarify any of these points. If you are at the ECI day for instance, I will be one of the speaker and would be delighted to meet you if you attend.

I know these issues are not purely about the revision of the regulation, but as the existing technical directive doesn't prevent these failures, it might be a good point to specify better requirements to avoid them in the future.

Best,

Xavier

Back to the Drawing Board for the ECI Online Collection System

Xavier Dutoit is the IT professional who developed the online campaign and signature collection tools for the first successful ECI - Right 2 Water. He has been a tireless advocate for a campaign- and user-friendly ECI Online Collection System (OCS). In this edited interview with The ECI Campaign coordinator Carsten Berg he explains why the current OCS needs to be scrapped and rebuilt from scratch.

Carsten: You are the first IT expert to conduct a successful ECI using the Commission's Online Collection System (OCS). What are your experiences with this OCS?

Xavier: In a word, my experience was unsatisfactory. The main issue was that we were a campaign and needed a campaigning tool but the OCS software developed by the Commission to collect signatures was oriented towards administrative goals. And there's a big difference between these two aims.

There were several problems during our long year of campaigning, many of which happened as a result of a faulty validation procedure. French signatures, for instance, were not recognized because the formats were unsuited for French passport and ID data. This issue was partly the responsibility of member states which had not submitted all of the existing valid formats to the EC. And we had the same problem in a lot of countries.

The impression I am left with is that the OCS is designed to reject as many signatures as it can. If there is the slightest doubt, then the system will reject it. We really felt as if the software was not working in the interest of campaigners.

C: We also learned that you had signature losses that were a direct result of the Commission's OCS. Did this only happen in the beginning or over the course of the entire campaign as well?

X: It was clear from the very beginning that the OCS did not work. The OCS was rejecting valid national ID formats. We had tens of thousands of users who contacted us saying "we can't sign because we're not able to fill in the captcha" [font]. The system couldn't handle the load. It worked fine when we had a few hundred signatures per day, but then it crashed completely for more than a week when we started getting traction.

When people who tried to sign were finding out that they were denied the possibility, they would tell their friends that this ECI "doesn't work". So not only are you losing the signatures of the people who tried to sign but also the potential of a snowball effect to promote the ECI and reach out to friends and friends of friends.

C: At an ECI workshop in March 2013, even EU civil servants from the Commission's Secretariat General admitted they had tried three times to sign. Did anything change after this?

X: Yes, even people from other DGs publicly stated that this needed to be fixed, but it didn't happen. Two new versions of the software have been released. But the captcha makes it as difficult to sign as ever. Meanwhile, among the "usability improvements", signatories are

now required to fill in the form in capital letters. Clearly the Commission deemed it more useful to block a name typed in lowercase letters than to fix the captcha.

C: What were your biggest challenges and difficulties with the official OCS, in a nutshell?

X: What we had been saying to the Commission is that the OCS should be integrated with the campaign website. Right now we technically have two different sites. One is trying to engage the user. The other is serving as a fortress that's as difficult as possible to enter. And it wasn't possible to link easily between the two.

The second issue was design and layout. It doesn't look like it belongs to a campaign and isn't suited for one.

The third was about the process. The Commission doesn't have any experience with campaigning or developing open source software. None of us knows everything. So we say: I am working on a new feature. This is the test version. Go try it and let us know what you think about it. When we said this, the Commission's response was to create two different committees with workshops and meetings. This is not the way you actually do open source development.

C: The Commission responded to the difficulties by extending the deadline for every registered ECI and then offered to help through the Luxembourg authorities as a temporary and exceptional service. How far did this solve the problems?

X: It seems the Luxemburg authorities were helpful for other ECI organisers. For us it didn't have much of an impact since we hosted the software on our own server. So we had already gone through the problem of certifying the server and software, and so on.

Right now the Commission can decide when exactly an ECI is launched. For organizers that means you don't know when the clock starts ticking. The ECI organizers should have the right to choose exactly when to launch the ECI once it's admissible.

C: Is it helpful to use one's own server?

X: We could see how many signatures we were losing and all the problems we had.

Discussions with other ECI organisers show that they are dealing with an even bigger black box compared to what we had. And it's even harder for them to know how many people are visiting, how many people click something, what is happening when people stop in the middle of the process, and how many error messages there are. This is information that's needed in order to run a good campaign.

C: It seems we can no longer expect too much from the institutions. I recall that in April 2013 a Commission official said essentially that they had done everything they could. How true is this? And what are your hopes and practical suggestions?

X: Well, I had several meetings with the Commission. The process and analysis was slow – much too slow for what we expect as campaigners. Not too long ago we installed the latest

version that was released and there is very little improvement, even though it was under development for an entire year! Even the number one complaint – simplifying the captcha – wasn't addressed in this version.

C: What kind of behaviour were you able to extract and identify based on your statistical data?

X: The person who signs the ECI wants to be informed about the campaign and the result of the ECI. Anyone who has run a campaign views this as logical. But the software was designed in an extremely restrictive way: once a person signs, the interaction is over. You don't have any opportunity to register for a newsletter. And legally we don't have the right to use the data of the supporter.

Now on the bottom left-hand side of the screen you have a little link offering the possibility to "go back to the campaign website". Still, it doesn't take place in a very user-friendly way because you have too many clicks and steps in between.

C: I think what should be done is to start from scratch. We know what the needs of campaigners are, we are familiar with the regulation and we know how to meet its specifications. Let's develop software that is more efficient and more campaign-oriented.

X: We've seen that a few improvements could make a big difference, but let's make a fresh start. Let's design the kind of software that campaigners want and need to be able to conduct a proper ECI.

C: However, on the basis of what we have right now, how exactly do you think the implementing and technical regulation specifying the OCS should be amended?

X: It should be the result of an open process. Let everyone suggest improvements to this regulation -- like we do for every internet standard, for instance.

Most of the key failures of the current regulation are the result of it having been written behind closed doors by people who have no experience of running a campaign.

Moreover, a few other issues should be taken into consideration. It should be explicit that the online form can be different from the paper one, because it is a different medium. Some countries already allow their citizens to carry out official transactions using their smartcard ID (e.g., Estonia and Belgium). This option should be included in the regulation. Other ways to validate signatures, for instance by sending an email, should be also available.

Furthermore, it should be explicit that the signature software is only a part of the ECI and must be integrated with the other parts (easier to embed, easier to redirect after a signature etc.). The software should also allow citizens to make their signature public (if they want it) or to share their contact details with the organiser (e.g., to sign up for a newsletter).

Last but not least, the Commission should provide a template for the risk analysis document and a list of best practices.

A complete version of this interview is available at www.citizens-initiative.eu.