

## Submission # 64

**Name:**Dr. Günther Cyranek

**Organization:**Consultant

**Country/Region:**Germany

**How would you define the stakeholder community or communities to which you belong?**

Individual capacity

**Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?**

Related to crosscutting themes, in my opinion the indicators B5 and C6 regarding school connectivity are overlapping.

Regarding Category O - Openness Theme E Open Data: If it is about privacy rights it should be related to informational self-determination