



# Playing the telephone game in a multilevel polity: On the implementation of e-government services for business in the EU

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## ABSTRACT

This article highlights the importance of user-centric design in the implementation of e-Government services in a multilevel government setting. It does so by examining the implementation of the 'Services Directive', which was adopted in the European Parliament in 2006 and required all member states to set up digital portals named Points of Single Contact (PSC). In this article we evaluate the Dutch PSC, and present the findings of a mystery shopping research in which we contacted 67 municipalities by using the PSC. We describe how the original requirements from the European 'Service Directive' have gone lost in translation and that national government, municipalities as well as businesses do not utilize the services as was intended. We propose a user-centric framework for the implementation of eGovernment services in a multi-level polity and conclude the article with specific recommendations to improve the policy process along these lines. We also propose mystery shopping as an evaluation tool for assessing user-centricity in eGovernment implementation.

## 1. Introduction

The telephone game is a game played around the world in which a message is whispered from one person to the next in a line of people until the last player announces the message to the entire group. Seldom does the whispered message get translated correctly along the line and the final message usually leads to giggles and disbelief. Reasons for changes in the message are attributed to impatience, erroneous corrections, faulty connections, or deliberate alterations by participants. In our study into multilevel governance of ICT in Europe, we found the telephone game to be a suitable analogy. The current model of ICT-based service delivery implementation by the EU depends on the co-operation of a long line of actors who operate on different levels (subnational, national, European) and communicate in a sequential manner (Mulder & Snijders, 2014). In this line, we argue, original goals, guidelines and intentions frequently go lost in translation. To show this we will focus on one case study, the implementation of the 'Services Directive', which was adopted in the European Parliament in 2006 to expand the internal services market in the European Union. One of the required instruments to further develop the internal services markets and facilitate communication between service providers and public authorities is the electronic transnational Point of Single Contact (PSC). Because the European Union does not have the authority, mandate or capacity to develop ICT-platforms such as this, the Services Directive

required all member states to develop their own platforms. In this article we look at the Dutch PSC, the 'Berichtenbox voor Bedrijven' or 'Message Box-system' (MB from hereon), which was recognized as one of the most successful portals by the European Commission and was used as a model for adoption by Croatia and Lithuania. The article trails the translation of this system and its requirement from Brussels to The Hague, where the Dutch National government built the MB-system, and further to the Dutch province of North-Brabant and to end-users. The province of North-Brabant was chosen as it is widely recognized as an advocate and frontrunner of e-Government services (and particularly the MB-system) in the Netherlands. Within the legal and territorial authority of this province, 67 municipalities operate which have all been obliged to implement the MB-system to improve communications between businesses and the state.

Theoretically the article highlights the importance of user-centric design in the implementation of e-Government services in a multilevel government setting. By users we mean the actual end-users and beneficiaries of the system, in this case European businesses seeking opportunities for new cross-border activities. Our theoretical framework draws on the literature of Multi Level Governance (MLG from hereon) (cf. Bache, 2007; Marks, Hooghe, & Blank, 1996; Scharpf, 2007) and eGovernment implementation (Heeks, 2006). We present a model for implementation of eGovernment systems in a multilevel context, whereby we focus on the position of the end-user as target group within

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the context of supra, national and subnational government levels. The article sets out to uncover the challenges of implementing eGovernment in this multilevel-polity, by studying the effects of the application of a European Directive for authorities at the subnational level and for end-users. In the context of the European Union this means involvement of different levels of governance, especially the subnational level, since they need to implement new systems for eGovernment. On the other hand, attention needs to be paid to the actual end-users, since the value of the systems is determined by the benefits they get from the system.

We base this argument on the findings of a study based on mystery shopping, in which we contacted all 67 municipalities in the North-Brabant province. We executed this research by setting up our own fictional company, by registering an MB-account and sending all municipalities a request for information with this account. In doing so, we collected data on our own participant observations with the system, on the response behavior of municipalities, and made a selection of 20 municipalities with whom we conducted telephonic and face-to-face interviews. Furthermore, we base our study on a literature review in which we examined evaluations of the PSC's in the Netherlands and different member states across Europe. These were carried out by the European Commission itself (EC, 2012) and by consultancies as assignments for local and national government institutions.

We conclude the article by describing how the original requirements from the European Service Directive have gone lost in translation and that national government, municipalities as well as businesses do not utilize the services as was intended. We discuss necessary preconditions for successful development and implementation of eGovernment services in a multi-level polity and propose the following recommendations: firstly the EU needs to assess the potential impact of proposed eGovernment systems during the phase of policy development. In this assessment, special attention needs to be paid to the subnational authorities, or other decentral authorities, that have to do the actual implementation. In MLG terms, we believe that various actors should interact more and work together closely in a manner that values non-hierarchical exchanges. Secondly, during the phase of implementation, more attention needs to be given to exchange of best-practices and learning strategies between the authorities of the member states. The Commission has a limited role when it comes to national implementation, but could be more active as a facilitator. Finally, the EU should evaluate and measure the real use and benefits of implemented cross border eGovernment systems. We found in this case-study that current monitoring programs mainly focus on legal aspects, such as the timely transposition of EU law in national law. In addition, evaluations by the EU of cross border eGovernment services should be more smart, in terms of actual use and value to end-users. The method which we explored, eGovernment mystery shopping, could offer a powerful instrument in this perspective.

## 2. Theoretical framework

Several authors stress the use of information technology in public service delivery (Layne & Lee, 2001; UN, 2012), and have defined three traditional categories of government interactions in studying this: government to citizens (G2C), government to business (G2B), and government to government relations (G2G). In this article we want to contribute to the discussion about the governance of eGovernment by looking at G2B-relations. Within the debate on G2B-relations we will pay attention to the vertical dimension of eGovernment, by focusing on the different levels of government that are interconnected and involved in the development, implementation and use of eGovernment systems. This vertical governance dimension of eGovernment is usually discussed within the context of one national state, with ministries at the national level, and different government agencies and regional and local authorities at the subnational level (Bekkers & Homburg, 2007; Dawes, Pardo, & Cresswell, 2004; Gascó & Roy, 2006; Gil-García, Chengalur-Smith, & Duchessi, 2007; Mayer-Schönberger & Lazer, 2007;

Rodousakis & Mendes dos Santos, 2008). This national view on eGovernment is also practiced in many comparative studies and benchmarks and peer reviews (e.g. Capgemini, 2015; OECD, 2007). Less is written and known about implementing digital government services in a multilevel governance setting such as the European Union and particularly there is not much literature on the MLG in relationship to G2B relations.

Since the EU defined its Digital Agenda in 2010 with strong leadership of Commissioner Kroes, it is undisputed that the EU has a strong position on digital affairs in the member states. That is, not only national governments decide on eGovernment, but the EU itself also influences such programs. This is a reason to rethink the architecture of policymaking and stakeholdership in the EU. Whereas eGovernment affairs were traditionally national affairs, involving the level of central government for policy making, and the level of decentral government in policy execution, since the Lisbon strategy of 2000, an extra level of governance namely the supranational EU-level, was added to the eGovernment policy domain. Such development has theoretically been framed as the aforementioned Multi Level Governance (Bache, 2007; Marks et al., 1996; Scharpf, 2007). MLG gained popularity as an alternative view on the state centric approach of the European policy process (Marks et al., 1996), which considered national state government as the key actors in the EU system. When it comes to the interplay of different government levels within the European Union, scholars usually turn their attention to mainly three levels or layers of public authority: the supra, the national and the subnational level (cf. Piattoni, 2009). MLG refers to the negotiated, non-hierarchical exchanges between the institutions at these different levels. They should not automatically “be seen as neatly vertically ordered institutional relationships” although they may be in a legal constitutional sense (Peters & Pierre, 2001). We agree with Milio (2010) who states that MLG cannot only be perceived as a model for policy implementation for the European Union in a descriptive way, but also in a prescriptive way. Successful policy implementation requires the input of all the government levels involved.

Looking at the characteristics of eGovernment however, we argue that an extra dimension needs to be added to the governance framework discussed above. This dimension is the end user, who benefits from e-services developed and implemented by government. In literature on information management the role of the end-user for the success or failure of IT projects is common knowledge (Abrás, Maloney-Krichmar, & Preece, 2004; Aldini & Bogliolo, 2014). This is also recognized by scholars on eGovernment, who stress the importance of user or citizen-centric design and policies and who criticize the supply-side driven approach, in which government decides on the implementation of e-services. Instead a more demand-driven user-centric approach is favored (Chatfield & AlHujran, 2007; Heeks, 2005; Karlsson, Holgersson, Söderström, & Hedström, 2012). Recently the need for this approach seems to be recognized by the EU. Not only is this happening in the specific domain of eGovernment (Capgemini, 2015), also the EU recognizes the strategic importance of participation of the policy beneficiaries in the process of making and implementing policies. The commission Juncker, which push for ‘Better Regulation’ (2015), states: “Today we outline further measures to deliver better rules for better results. We will further open up policy-making and listen and interact better with those who implement and benefit from EU legislation” (2015, p.3). Where the Commission asked strictly for partnering with national and subnational government in 2001 (White Paper on Governance 2001), the new Commission now targets “those who benefit”. Along the line of the Commission Juncker we argue that it is imperative to incorporate the end-user, whether it is a European citizen or a company, into an MLG framework and stress the importance of the end-user's direct relations with all three governance levels to make e-Government work.

Fig. 1 illustrates our framework for discussing eGovernment in this multi-level setting. Where several government levels are involved

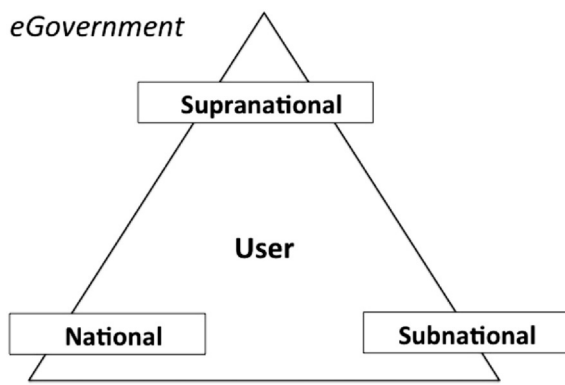


Fig. 1. User-centered Multi Level Governance.

(supra, national, subnational), each with its own responsibility and tasks, the end-user is at the center of the triangle which symbolizes the political arena in which every policy gets developed and implemented. The user is in this model part of the arena and also a final “judge” to the delivery of public value.

### 3. The European services directive

In 2006 the European Parliament agreed to the ‘Services Directive’, which sought to develop the internal services market in the European Union. It aimed both at easing cross-border operations for entrepreneurs such as fitters, window cleaners, plumbers and caterers within the European internal market as well as for governments to cooperate and assist entrepreneurs in doing so (Barnard, 2008, p.323). Prominent studies from the time showed that a European internal services market would lead to substantial economic gains (cf. Copenhagen Economics, 2005, pp.13–14). Whereas parties throughout Europe agreed that a Services Directive could have benefits, the fundamental question was how to make such a framework work in a context of (now 28) different national sets of rules and regulations. In terms of services there are very different requirements to professions and qualities of services throughout Europe and the idea of integrating these led to fundamental discussions about the future course of Europeanization. The Services Directive got drafted and redrafted various times as the original idea became part of a larger political discussion: ‘was the EU about deregulation and letting the market decide (the so-called Anglo-Saxon model) or was it about interventionism by central government intended to protect consumers and workers (the stereotype of the Continental approach)?’, Barnard posed (2008, p.323). The so-called “Polish plumber” became the embodiment of this discussion in Brussels: welcomed for providing cheap high-quality services by some, feared for lowering prices and impacting jobs by others. Much attention and energy was spent on such debates in the public domain, leaving more operational details of the Directive in the shade. During the implementation phase however, it turned out that the devil was hidden in these details. The Directive required Member States not only to screen own policies and eliminate hindering regulations, but, more practically, it also required Member States to set up virtual Points of Single Contact (PSC).

These PSC's, which are the focus of this study, are service portals that are meant to offer key information and facilities for cross-border communication to ‘ensure that all procedures and formalities relating to access to a service activity and to the exercise thereof may be easily completed, at a distance and by electronic means’ (Article 8, Services Directive). The European Commission stated that these PSC's are ‘certainly the most visible benefit of the Services Directive for businesses. They are meant to become fully fledged e-government portals allowing future entrepreneurs and existing businesses to easily obtain all relevant information relating to their activities (applicable regulations,

procedures to be completed, deadlines, etc.) and to complete electronically the relevant administrative procedures’.<sup>1</sup> PSC's were thus implemented in every Member State, being accessible for entrepreneurs and service providers all over Europe. A Polish plumber would hereby be able to register with the Amsterdam Chamber of Commerce from his or her own personal computer in Krakow. The PSC's were thus required to be available electronically, at a distance, and, to prevent the service provider from contacting many different authorities, to form single institutional interlocutors from the perspective of the service provider (Van der Wijst & Groothuis, 2011, p.317). Besides technical and financial challenges, this set of requirements led to major challenges for governance and authority as it necessitates ‘profound interoperation between local, regional and federal authorities, as well as with external support institutions’ (Breitenstrom, Eckert, & Fromm, 2011, p.2).

The Services Directive was finally implemented on December 28, 2006 and it had a large impact on eGovernment practices in the EU (Van der Wijst & Groothuis, 2011, p.316). Within a short time-frame of two years, all Member States were required to set up electronic portals through which national as well as Member State businesses could be facilitated in requesting and receiving services. It also required pan-European standardization of cross-border electronic procedures, e.g. authentication of documents, signatures, identities, etc., as this infrastructure was not in place when Member States started with the implementation of the Services Directive. This caused the European Commission to start large scale pilots to work on cross border interoperability together with consortia of governments, private companies, universities and other institutes of the member states (Bovalis et al., 2014). These large-scale pilots needed to deliver the technical, legal and organizational building blocks for a Digital Services Infrastructure, with the motto “Connecting Europe”.<sup>2</sup> To make this pan-European infrastructure function, Member States also needed to have their own national digital infrastructure in place. At the time of the implementation of the Service Directive, most Member States were still working on this.

### 4. Case study: The message box in the Netherlands

The Services Directive was implemented in the Netherlands through the National Services Act on December 28, 2009 (Van der Wijst & Groothuis, 2011, p.316). This act made the Dutch Minister of Economic Affairs responsible for the establishment, maintenance, and security of the Point of Single Contact (PSC). This Ministry was already in charge of the webportal ‘Antwoord voor Bedrijven’ (which can be translated as ‘Answer for Business’), the national portal for information on new regulations, subsidies and services for Dutch business. The MB-system was integrated in the general web portal and is provided through a Secured Socket Layer (SSL) which must be accessed via a central website by both service providers as authority. After registering, service providers obtain their own private MB-account with which they can communicate with all Dutch government agencies (ibid. 317). Governments at all levels - national, provincial and local - were required to integrate this national digital portal into their own eGovernment systems.

Formally, member states had three years to implement the Directive. The implementation trajectory was to include the legal transposition and the conceptual design of the MB-system. In practice this meant that only limited time was available for the implementation of the MB-system and because of this limited time, the design of the MB-system was kept simple. End-users in terms of firms and businesses were not involved in the design and testing of the system and the final result

<sup>1</sup> See: [http://ec.europa.eu/internal\\_market/services/services-dir/implementation/points\\_of\\_single\\_contact/index\\_en.htm](http://ec.europa.eu/internal_market/services/services-dir/implementation/points_of_single_contact/index_en.htm)

<sup>2</sup> [http://www.egov2012.gov.cy/mof/DITS/conference/Europeone.nsf/All/E7916860932FBB22C2257ACB004BAEBE/\\$file/p3CEF%20-%20EuropeONEMR%20v2%20.pdf](http://www.egov2012.gov.cy/mof/DITS/conference/Europeone.nsf/All/E7916860932FBB22C2257ACB004BAEBE/$file/p3CEF%20-%20EuropeONEMR%20v2%20.pdf)

were described by our respondents as basic. From a national level the promotion of the PSC to national firms and businesses was limited to a few specific target groups (such as hospitality and childcare). National radio commercials were used to attract public attention for the general web portal for Dutch businesses, not so much for the PSC and its purpose or functionalities. At the subnational level, the organizational implementation of the MB-system was left to the more than 400 municipalities themselves. Some invested in the introduction of the system to the organization, but this was not a general rule.

## 5. Mystery shopping as an evaluation method

In examining the user-experience of the Dutch PSC, this research applies data triangulation (Guion, Diehl, & McDonald, 2011) based on a three pronged-approach. That is, we gathered data on user-experience by means of mystery shopping (a form of participative observation), a quantitative component and qualitative interviewing and compared the results from the various methods to each other. Mystery shopping 'uses researchers to act as customers or potential customers to monitor the quality of processes and procedures used in the delivery of a service' (Wilson, 1998, p.414). It has significantly gained popularity in the last decades amongst research advisors, consultants, business studies and in organizational sciences (Erstad, 1998; Tang, 2014; Wilson, 1998). We argue that it is a good tool for doing assessments of eGovernment services in particular, as these platforms consist of digital environments in which a large number of users and providers are tied in. A prime benefit is that a mystery shopper can fairly easily access, test, and re-test a large number of digital services and functionalities while interacting with (a large number of) respondents in the process. In our case, the participative dimension proved to be most valuable for studying an eGovernment communication system because, besides being a study object, the MB-system itself became an instrument for us to collect research data. To do this we set up a fictional organization, Filmhuis NL (literally: Filmhouse NL), registered for an MB-account under the Filmhuis NL's name, studied the functionalities and configuration of the system, and used it intensively to send our requests and receive responses. With our MB-account we sent an information request to all 67 municipalities of the North-Brabant province in the Netherlands to test if municipalities use the MB-service, how they use it, and how timely they use it. In the request we told the recipients that we were interested in shooting a short film in their municipality and asked if we were allowed to do so on specific dates, if permits were necessary for this, which ones, and if it was possible to obtain these through the MB-system. Three weeks after the initial request all municipalities were informed through a physical letter about our research and the context of it.

For further research, a selection of municipalities was made based on the results of the mystery shopping studies. In selecting these municipalities we took municipality size (large  $\geq 100,000$ , middle = 50,000–100,000, and smaller municipalities), regional spread and answering behavior (answer or no answer) into account. In total, nine small municipalities, six middle municipalities and five large municipalities were contacted. Five municipalities were selected to do face-to-face in-depth interviews of approximately an hour (1 large municipality that did answer and both a small and medium municipality that answered as well as one that did not). These interviews were taken on the basis of a closed set of questions about the user-experiences in which we asked for a demonstration of the MB-system and its workings. In the face-to-face interviews we asked to speak to both those who dealt with our request and those who were involved with information policy within the municipality. The interviews provided us answers to 'tell me' questions, but also gave insight in 'show me' inquiries, as officials were asked to demonstrate their access, use, and insights into the MB-system.

The other fifteen municipalities were contacted by telephone. These interviews were taken on the basis of the same closed set of questions about the user-experiences, but did not include a section of questions

about the specific workings and demonstration of the MB-system and therefore were shorter, approximately 30 min each. Our respondents had various functions within the municipality, but were generally those who either worked with the MB-system or had responsibility for it. In total, we spoke to 25 persons of 20 municipalities and posed six blocks of questions; on personal details, the actual use of the MB-system, the institutional embeddedness, the knowledge of the system within the larger organization, the use of the MB-system to contact other governments, and a general evaluation.

In comparison, as part of the literature review we looked into eGovernment evaluations of the PSC's in the member states in general and in the Netherlands in particular. We studied their outcomes, and the methods that were used. These studies were conducted by the Commission herself (EC, 2012), and by private consultancy firms (PWC, 2012).

## 6. Analysis and results

In this section we will first look at the results of our interviews, then the mystery shopping method, and finally compare the outcomes with the results (and methodologies) of other evaluations.

### 6.1. Interviews

In examining the use of the PSC by 67 Dutch municipalities we found that the system is not used frequently and enjoys little satisfaction (see Fig. 2 on PSC response behavior). Less than half (46%) of the total amount of municipalities reacted to the request that was sent to them. A little over a third (36%) gave an adequate and timely response (within three weeks) to the request. Eighteen percent gave what we named inadequate answers by either sending a confirmation message and nothing else, or asking us to contact them through an alternative medium (telephone, email or face to face). Although the 'alternative medium requests' can be interpreted as service delivery, we see them as conflicting with the original purpose of the MB-system and its ambition to facilitate digital inter-European communication between municipalities and companies. That is, a plumber from Krakow will not be able to easily visit a local Dutch town hall. In our analysis we separated the results in large, medium, and small municipalities but no significant differences were found in their response behavior (see Fig. 2.)

The majority of municipalities (85%) stated they received less than one message per month through the MB-system, while the remaining respondents stated the number was unknown (See Fig.3). One third of the municipalities told us our message was the first one they had ever received. Moreover, the lack of use has led to the absence of routine. Some respondents shared that each time a message is received, recipients would have to rediscover the basics of the system such as logging in or processing messages. The Ministry of Economic Affairs, which manages the system, shared with us that many password recovery requests were sent to their office in the days after we sent our mystery-shopping request. Nationally, the PSC is used by a handful of Dutch companies and approximately 150–200 messages are sent on a weekly basis (interview policy officer Ministry of Economic Affairs July 9, 2013). The numbers for cross-border use are negligible.

The lack of promotion of the MB-system by the government may also be a direct cause of its small user base. This may have led to the lack of either familiarity or interest amongst companies as well as governments. In assessing the results we found that national companies and especially international companies do not use the facility frequently. With regards to government unfamiliarity several respondents did not seem to understand why the MB-system was to be implemented. In the interviews we held they reasoned that various alternative digital platforms can be used by businesses and questioned why they were to invest in 'yet another platform' as 'contacts with business is already sound'. One municipality official stated: 'If a big company wants to settle here, do you really think we'll ask them to process their permits



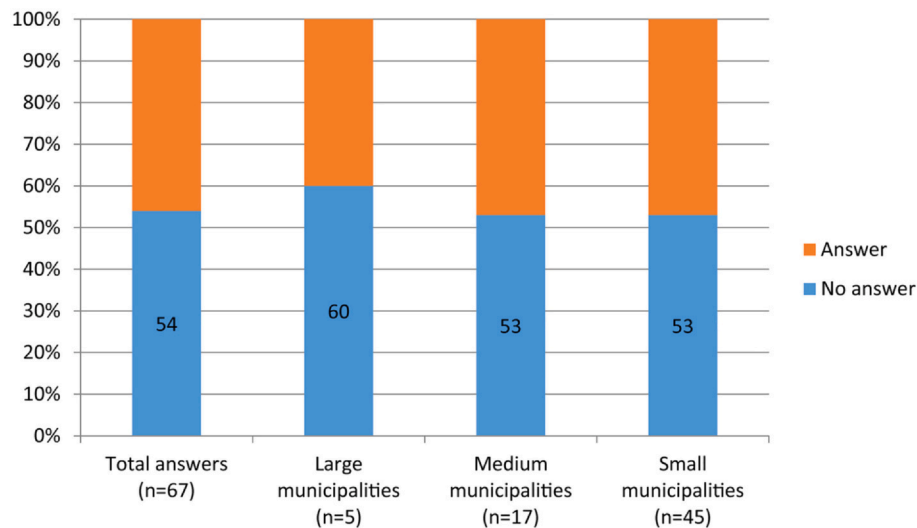


Fig. 2. PSC response behavior by municipality size.

online? Of course not, I'll invite them over for coffee, see if an alderman has time, and welcome them appropriately'. Besides alternatives, our respondents mentioned the MB's lack of features and user-unfriendly interface as reasons that caused its low usership. Some municipalities officials stated that they are consciously silent about the service to companies because of this reason, and few said that they are waiting for a more stable and improved version to appear.

Multiple respondents criticized the anonymity of the MB-system (see also the results from the mystery shopping method below). Hereby they referred to the MB-system's functionalities, which at the time of the research did not allow messages to be sent to individuals (but only to municipalities or other state organs). Also, messages could not be forwarded to individual email-addresses or colleagues, which caused frustrations with the officials checking the initial messages. Some respondents would copy and paste the messages to their own email-system and forward it from there, while others would pass on the password of the system to other users.

Through our interviews into the practicalities of the system we

received mixed answers. Very few respondents were aware of the European dimensions of the PSC-system, and quite some users blamed The Hague (where the Dutch government resides) for the MB-system. For instance, some users did not understand why 'The Hague' was implementing this system and mentioned they were not fully informed about the added value it could have for them. Especially, this point of added value was questioned in regards to the numerous existing digital portals.

A quarter of our interview respondents stated there had been explicit communication and/or training concerning the implementation of the system, although this had not been recent. Most respondents stated they either had a different job at the time of implementation or could not remember such communication. Because municipalities had little experience with it they found it difficult to assess how the MB-system has changed their relation with service providers. None had had interaction with service providers from different member states and one mentioned they had had complaints from local companies who found the system was not user-friendly. No municipalities stated that they

### PSC response behavior (n=67)

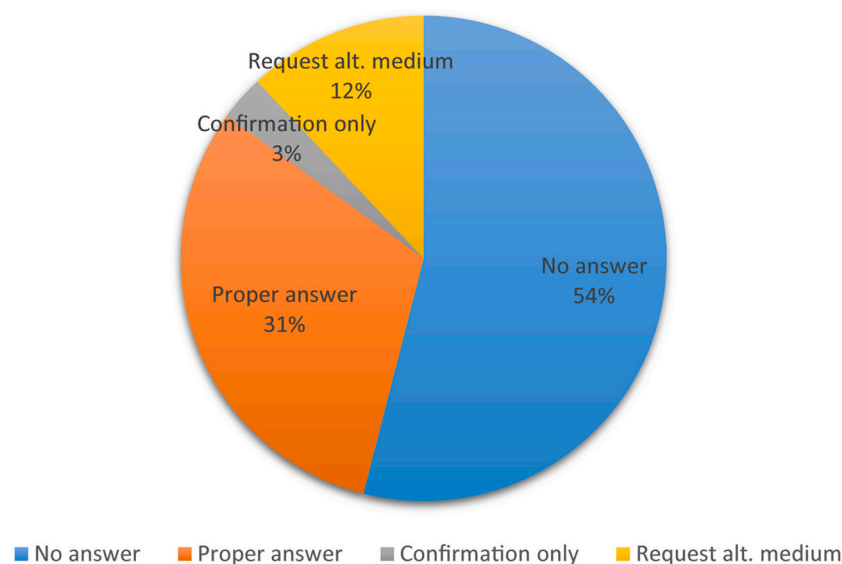


Fig. 3. PSC response behavior (n = 67).

actively promoted the system to companies, and one respondent added that this was because of embarrassment about the instability of the system.

## 6.2. Mystery shopping

The mystery shopping method offered the researchers the opportunity to experience the MB-system as end-users. Four points stood out.

- Firstly, the MB-system is an online portal which features like a web-based mail portal that has a basic design. One can send messages to one recipient at a time, one cannot forward messages outside the MB-domain, and it lacks features that are common in commercial mail-systems (such as editing, highlighting or sharing functions) or management features for organizations.<sup>3</sup> Each user has one account, including municipalities and large companies. For small organizations such as our own fictional company this would not be an issue, although it forces bigger organizations and municipalities, which may have multiple issues and stakeholders involved, to consider how the account is managed and shared throughout the organization.
- Secondly, the system needs to be maintained and developed further, a task which is in hands of a national agency. Because of limited funding and minimal input from governments using the MB-system, this lead to suboptimal results. For example, while sending messages we found that we could choose from a dropdown list of government institutions. Some of the municipality names were misspelt and could therefore not be contacted. In our communication with one of these municipalities we found, unsurprisingly, they had not received any messages as of yet.
- Thirdly, it seems that security issues have led to decreased functionality. That is, for security reasons the communication within the MB-system can only occur between the service provider and the authority in question. Because of this, one has to log in to the system continuously as a service provider or municipality; the system cannot be integrated with other communication systems. Also, necessary cross-border infrastructure for authentication and identification is lacking. The Netherlands has different digital identification infrastructure than other member states and interoperability is a point of concern; international users may be barred from Dutch PSC's, while Dutch users may be barred from international PSC's.
- Finally, although the Service Directive was intended to solve cross border interoperability problems (for firms and businesses), it mainly became a platform for national businesses. Thereby, the MB-system became a rival for existing G2B communication channels. For example, all Dutch municipalities have their own websites, and special portals for businesses. For an individual company this creates a problem of choice: what is the best digital channel to communicate with government? Vice versa this problem also exists at the side of government; which digital channel is the most ideal to communicate with business?

## 6.3. Literature analysis of other evaluations

As stated, in addition to interviews and mystery shopping, we analyzed other evaluations of the PSC's that were made for G2B communications within the service directive framework. Generally speaking, both the national evaluations and the international comparative evaluations are in line with our study in terms of the workings of the PSC. PWC (2012) concludes that in the Netherlands there was not much promotion which resulted in a lack of visibility of the MB-system amongst businesses. They further came to the conclusion that existing

communication channels such as face-to-face, telephonic and non-digital correspondence is preferred over the MB-system because it is better known and more trusted. PWC notes particularly that there is a lack of implementation, use and promotion of the system amongst subnational governments. Deloitte, which was commissioned by the European Commission to evaluate the systems (European Commission, 2012), notes that PSC's have been implemented in all member states and that progress has been made in the shift from a paper world to an electronic world. They do categorize this shift as being incomplete and note that of the business and government focus groups they questioned, only 30% were aware of the existence of the Point of Single Contact in their own country.

Although the outcomes of these studies are in line with the main findings in our study, the research question was slightly different: they researched whether the PSC has been implemented, what functionalities were built, and if the system is known amongst end-users. The study of Deloitte (2012) looked at the user-perspective by introducing the PSC-functionality to panels, who tested the PSC on effectiveness, efficiency and satisfaction. This testing teaches us more about usability of the PSC than about the actual use of the PSC or about factors that influence this use. We believe that a user-centric focus, by means of a mystery-shopping methodology or other direct user-centric engagement, has the potential to add an important qualitative dimension to evaluations to further demonstrate how and why an eGovernment system is used, known, and appreciated or not.

## 7. Conclusions and discussion

The services directive strategically aimed at the improvement of cross-border cooperation within the internal service market in Europe. One of the main instruments to achieve this was the implementation of the PSC in the member States. Our research shows that in the process of being translated from the original supranational requirements to a national, subnational and finally user-level, some of the original intentions for setting up the system were not realized. More than three years after the compulsory implementation of the PSC in the Netherlands, the actual impact on digital interactions between government and firms and business are minimal. We point out three reasons for this, at the policy-development stage, the multilevel implementation stage, the design process, and also in the evaluation stage.

Firstly, in the policy development stage we note that when it comes to eGovernment, the European Union has only limited powers (Alabau, 2004; Criado, 2009; Criado, 2012) since the Member States have not granted it regulating authority. As a consequence, the policies on eGovernment by the European Union are often seen as "soft regulation". On the other hand, requirements on eGovernment are, as the Service Directive demonstrates, also part of directives and regulations based on "hard regulations". Those hard regulations need to be formally transposed by national governments, whereas the actual implementation and application takes place by authorities directly interacting with businesses and citizens, which is in most cases on the subnational level.

Secondly, the multilevel implementation of the MB-system from the supranational to the subnational level within the municipalities was largely an administrative affair, where attention on organizational issues was lacking. Also the positioning of the MB-system within the eGovernment strategy of the municipalities received too little attention. The MB-system turned out to have few supporters within the municipality organizations and, to add to this, the target groups of end-users, firms and businesses, were hardly informed about the existence and functionalities of the MB-system.

Thirdly, there was no user-centric design process for the MB-system. Due to the pressure to implement on time, a very basic design was developed and distributed. Neither subnational governments that needed to implement this facility, nor firms and businesses that needed to use this facility were closely involved in the design. After implementation little budget was assigned to the further development of

<sup>3</sup> We were told by the Government service in charge of the system that the functions will be improved over time.

the system.

Although this is not the place to describe a redesign of the EU-design of policy making, we do suggest a serious assessment of the way eGovernment impact is treated in EU policy making as we found an absence of the user's involvement at all levels of the described governance triangle. We therefore recommend two general measures.

1. First, during the phase of eGovernment policy development, the EU needs to do assessments and consultations on the impact of eGovernment systems that are meant to be implemented as a means to reach certain policy goals. In this assessment, special attention needs to be paid to the subnational authorities that have to do the actual implementation, next to the final end users. In MLG terms, the various actors should interact more closely in a manner that values non-hierarchical exchanges at different levels. Of course, this relates to subsidiarity, one of the main principles for demarcation between the EU and the national authorities. In our opinion, subsidiarity should not be a non-intervention measure when it comes to the improvement of the quality of EU policies.
2. Second, the EU should not only monitor the legal implementation of her policies, but also the delivery of public value by studying actual implementation, especially if eGovernment services are required. The current monitoring on national implementation and compliance of EU regulations and directives is largely focused on legal transposition aspects. Also, guidelines for implementation of EU policies are mainly stated in legal terms. When it comes to facilitating and monitoring the actual implementation of eGovernment systems, there is a lot of ground to cover. Evaluations should go beyond turfing the existence of eGovernment applications and their judicial transposition. Important themes such as awareness, usability, understanding of the rationale could be targeted in an earlier stage by including end-users in both policy and system development. The experiences of eGovernment service providers such as municipalities should equally be given more attention. The way that local eGovernment infrastructures work and the way in which specific systems can be embedded into existing organizations are important preconditions for successful use of MLG eGovernment systems.

Unfortunately, we believe the telephone game is an accurate analogy for the case study we described in this article. From the initial whispers in Brussels about the service directive, to the policy translation at a national level, to the ICT-building process at a national level, to the implementation at a provincial level, to the workings of the system at a local municipal interchange between policy makers and businesses there are a lot of translation errors and misunderstandings. Just as in the case of the telephone game, the reasons for this can be attributed to impatience, erroneous corrections, faulty connections, or deliberate alterations. To avoid this and reap the benefits of eGovernment in a multilevel setting such as the EU, we believe that measures need to be taken to make the end-user a full-fledged partner to supranational, national and subnational officials in both the development as well as the implementation process regarding eGovernment systems. This demands for new instruments and procedures when it comes to the design, implementation and evaluation of eGovernment EU policies.

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