

Title:

Mr

Forename:

Matthew

Surname:

Harrison

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

My email address

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you agree that copy management would broaden the range of HD content available on DTT and help secure its long term viability as a platform? :

No.

Question 2: Do you agree that the BBC's proposed multiplex licence amendment represents the most appropriate means for securing an effective content management system on HD DTT? :

No. The most effective system for customers would be for no content protection system to be introduced.

Question 3: Do you agree with the proposed change to Condition 6 in the Multiplex B Licence? :

No. It would restrict innovation and consumer choice in decoding hardware.

Question 4: Do you agree that Multiplexes C and D should be granted a similar amendment to their Licences as Multiplex B?. :

No

Question 5: Do you agree that the BBC's proposed approach for implementing content management would safeguard citizens and consumers legitimate use of HD content, and if not, what additional guarantees would be appropriate? :

No, it would not safeguard citizens and consumers legitimate use of HD content. It will limit the ability of converged devices (media devices which provide multiple functions, such as combining a PC with a phone with a TV, etc) from easily adding HD content recording and playback.

The required guarantee is that no licence should be required in order to receive and process HD content.

Question 6: Do you agree that the BBC's proposed choice of content management technologies will have only a negligible impact on the cost of HD DTT receivers and their interoperability with other HD consumer equipment? . :

There are many groups providing free of charge software capable of decoding, storing, managing and playing back visual content. These groups are only able to operate in this way by sharing all codes and specifications freely. If they were to try and enforce mandatory protection, they would invalidate their licence to the body of code required to create these products. By enforcing content management, these free implementations would be removed from the market.

The BBC has tried to mislead Ofcom by suggesting that 'The licensing terms for Open Source software typically require that this software is made freely available to others to use, which may be incompatible with and the licensing terms of the BBC's Huffman Code look-up tables. This issue appears to have been addressed by HD Freesat receivers that use Linux Open Source software and implement similar content management technologies'. This deliberately misses the point. These players use closed proprietary software to decode the TV

signal. The status of the code running the underlying system is of no relevance.

Interoperability would be greatly compromised. In most homes there are many devices which can process HD content. Most computers, 2 leading games consoles and many networked TV sets can already interoperate and view HD content from any networked source in the home. Some of these have support for content copy control, but all in differing incomparable ways. The only way to remain comparable with the existing installed base of equipment is not to implement copy control.

Question 7: Do stakeholders agree that the BBC's proposed Huffman Code licensing arrangements would have a negligible effect on the market for HD DTT receivers? :

No, it would wipe out one existing market and prevent the growth of a future market of low cost, extremely interoperable equipment.

Question 8: Do the BBC's proposed content management states and their permitted use for different categories of HD content meet the requirements of other HD broadcasters on DTT? . :

Question 9: Are there any issues that you consider Ofcom should take into account in assessing the BBC's proposal, that have not been addressed by this consultation?:

Limiting the use of content is likely to shorten the lifespan of broadcast TV. The consumer generally takes the easiest route to find and display the content they require. If you force them to jump through hoops, they will either move to buying DVD box-sets or downloading shows over the internet, legally or illegally.

I would be personally affected by this proposal. I run an open source TV recording, storage and playback system which records broadcast TV centrally and makes it available to any screen in my house along with my DVD and music collection as well as on-line media sources. This system was cost effective to buy, but a system using proprietary software would have been prohibitively expensive. My personal setup may be considered impressive by the standards of 5 years ago, but by the standards of 5 years in the future, it will be routine and will be available in most homes, so long as the UK broadcast infrastructure is kept open and content management is not introduced.