

What do you want Ofcom to keep confidential?:

Keep name confidential

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

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:

The BBC are essentially proposing to hand control of granting access to DTG, because compliance with DTG's conditions is a pre-requisite for a licence. The statement that non-commercial organisations, including those producing open source applications, would not be excluded is effectively worthless because DTG has little or no motivation to include those organisations. Also, compliance with DTG's conditions may be prevented by the open source licences these organisations have irrevocably dedicated their products to.

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? :

The argument for this is easily stated: content producers will produce less content due to their lack of control.

However, this argument has been deployed over the introduction of video, cd, dvds, internet content, etc. It seems unlikely that it will turn out to be true in this instance, when it was clearly not true in these previous instances.

Various attempts to control content, in computer gaming, music, dvds, etc, have had no effect on the ability of a small number of people to effectively "pirate" and distribute content. While I don't condone it in any way, it is clear that these people are in no way deterred by control attempts. Control only hurts legitimate users.

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? :

-

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

No

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? :

-

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? . :

Simple macro-economics: the ability to differentiate your product from others (which lack of interoperability increases) allows you to raise prices.

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 will remove the cheapest end of consumer options (open source software on a modest computer). Even if only a small number of people use that option, its existence brings down the price of other options (this is simple macro-economics in action)

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?: