

**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:**

**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 - I think that content management would seriously damage the long term viability of the platform. While a short term boost in high budget content may be possible, long term the platform would become deprecated.

The attempts by the music industry to force DRM on electronic music sales. It quickly became apparent that such technology only served to hinder their customers enjoyment and fair use of the media, whilst at the same time doing nothing to prevent the large-scale sharing of such media amongst those who had not paid, or who may have paid were it not for the DRM restrictions.

**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. I believe that the managing the content in this way will prove to be ineffective in achieving its desired aims.

**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? :**

No. Fundamentally, the process will prevent a large range of legitimate use of content. Unless the protocols and encryption used were made freely available, this would remain the case. Of course, doing so would defeat the purpose of the content management system.

**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? . :**

No. By deliberately restricting the ability for a free and open method for working with the content, it is only natural that this will hinder innovation and free development of such devices and tools. This would be particularly true of ensuring trouble free compatibility with past, current and future equipment.  
It will also effectively rule out the (legitimate) use of open source software for playback of content.

**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. The licensing arrangements would naturally restrict the number and type of devices which could be made available to consumers - either as marketed products or enthusiast equipment (or similar).

**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? . :**

Possibly, but I fail to see the relevance. Perhaps I do not understand the question.

**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?:**

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