

Title:

Ms

Forename:

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Representing:

Self

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What do you want Ofcom to keep confidential?:

Keep nothing 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, absolutely not. Investment in new and original content would be a better use of the money involved in implementing DRM. The BBC in particular has had a reputation for this

type of programming before, and providing more of this is likely to support the viability of DTT HD as a platform far better than wasting money on futile attempts at restricting illegal copying.

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 content management system is not to implement any restrictions at all. Taking the no-DRM approach is a 0 cost option, maintains consumers rights to make fair and legal use of content and encourages the development of innovative and affordable receiver equipment.

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, absolutely not. The legitimate use of content would be seriously hampered. This has been true of all past DRM implementations, e.g. copy protection on music CDs led to them being unplayable on many home computers.

Any of the approaches that were used before, e.g. in the example above where a special player were provided, would lead to increased complexity and restrictions.

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? .:

Actual cost to manufacturers would likely not be affected significantly though the prices a consumer pays could well be - essentially devices with this support would be more expensive than those that do not.

Interoperability will be dramatically affected, even if the devices concerned support DRM the extra complexity could well lead to problems. There is also the increased potential for legitimately recorded content to become unusable due to software changes or bugs, thus providing more inconvenience and cost to consumers.

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? :

I am not a stakeholder in this per se, however I would suspect that this proposal would allow device manufacturers force consumers to purchase new products to support the implementation of these proposals. Their incentives to update older hardware are not apparent and I would expect would be dismissed on the grounds of cost or viability.

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? . :

I am not able to comment on this.

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?:

There isn't a single commercial encryption system in existence that has not been cracked or circumvented in some way. No matter what technique is used by the BBC, those who have the technical know-how will, eventually, render any implementation of DRM ineffective.

Forcing the implementation of a DRM technology is likely to increase the level of illegal copying rather than reduce it. This appears to be the case with existing formats such as DVD, CD, and BluRay.

Forcing a DRM implementation would also add to or cause compatibility issues with devices that would interfere with consumers legitimate use of content. Devices that consumers currently own or may purchase in the near future may become obsolete very quickly if this proposal goes ahead.

Quite simply, this proposal will not, in any way whatsoever, bring benefits to the consumer, quite the reverse; it will restrict competition in the marketplace, restrict or eliminate fair-use of content and ultimately cost a significant amount to license fee payers.