

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. Copy protection would be used, much as it has been through other paths like the Apple iTunes store, to control access to existing content to extract additional revenue from consumers, rather than encouraging additional content. BBC content suppliers will supply content regardless of copy protection. I also believe the long term viability of the platform is threatened by DRM. Experience has shown that DRM leads to consumer frustration (as older iPhones, iPods, etc fail to play the content and consumers are forced to pay for upgrades) and will likely therefore increase piracy rather than reduce it. Pirates have a history of rapidly breaking DRM and only genuine consumers then suffer a lack of functionality.

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. It is insufficient to prevent piracy but significant enough to cause cost and inconvenience to consumers. If piracy is to be the main target (and not squeezing additional revenue from consumers) a substantially stronger DRM system would be more appropriate.

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

No. I would prefer a removal of all DRM proposals.

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. Any DRM will add restrictions to legitimate use of content and, as experience has shown, offer limited resistance to pirates. Content would still be copied illegally, but consumers and license fee payers would be prevented from making legitimate use of content. Freedom of access to content should be guaranteed.

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. The cost for manufacturers might be negligible, but consumers who have to replace existing equipment (iPods, mobile phones etc) the cost could be very significant.

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? :

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?: