

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:

Questions 1 & 2, in particular, are biased in their wording and suggest that this Ofcom consultation has been designed to produce an outcome favourable to the proposed changes.

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. This is a backdoor attempt to introduce DRM restrictions into public service broadcasting. Apart from the obvious limits this would put into the consumers use of a service paid for via the licence fee it would also have a very negative effect on viewing solutions based around open source software.

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. There is no more need for 'content management' on HD than there is for standard definition broadcasts.

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

No. This is the backdoor attempt to introduce DRM already referred to. Since encoding the actual broadcast program is not permitted the BBC is proposing to scramble program information as a means of forcing hardware manufacturers to implement further constraints.

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

Obviously not since I do not agree it should be applied to Multiplex B.

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. I do not need to a 'safeguard' against being able to watch programs paid for via my TV licence as and when I want to. Threats from media concerns that they won't make their content available unless DRM is introduced are entirely bogus but, in the unlikely event they actually choose to withhold some content, it will be my choice to obtain that content via other means, i.e. by buying the Blu-ray disk or whatever.

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. I note that the consultation document makes an unsupported assumption that receiver costs would go up if DRM was not introduced because sales would for some reason drop. The basis for this appears entirely imaginary and is presumably put in solely to provide spurious support for the proposal.

Obviously introducing particular constraints for local markets will introduce extra costs for manufacturers and complicate their product range.

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? :

Speaking as a consumer 'stakeholder' all I can foresee is that making a given product more restrictive in its usage just makes it more unattractive and therefore less likely to be something I'll spend money on. Open solutions and markets do better than closed ones.

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? . :

No comment.

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?:

Broadcasting paid for by a licence fee is inherently different from cable/satellite services. With the latter I have a choice as to what to pay for and, if they impose restrictions on recording or similar, it is up to me to decide whether this is something I can accept. And if I don't then I don't buy the service, it's as simple as that.

With the licence fee I have no (legal) choice as to whether I pay or not and therefore can't opt out of paying for a service that does not meet my requirements. If the BBC wants to bring in DRM systems for essentially commercial reasons then perhaps it should no longer be funded by a licence fee.