

**What do you want Ofcom to keep confidential?:**

Keep name confidential, Keep organisation 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? :**

Not at all - the opposite in fact. The success of Freeview has been that it is a platform unencumbered by DRM - any compatible DVB-T device, on any technology platform, can receive the signal and decode it. This has led to DVB-T being the favoured solution for computer based TV, as the predominant player in the DVB-S space (BSkyB) does not allow access to their decryption technology on anything other than an authorised device, and they will not authorise anything other than BSkyB controlled set top boxes.

**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. They presume that content management is required in order to get HD content onto the DTT platform, rather than looking at whether a lack of content management would inhibit the ability to attract movies to the HD channels. If no DTT channels were protected in the UK, the movie industry would have to decide whether to broadcast on UK DTT or not. Given the importance of UK DTT it seems inconceivable that they would decline.

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

No. Apart from the disagreement as outlined already, the changes go further than the original request for the copy management and require the use of HDCP compliant displays. This means that only TVs that are capable of displaying 720p video but not with HDCP compliant

connections would not be able to view any of this content, which is against the public service remit of the BBC to reach the widest possible audience with their services.

**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? :**

Again not at all. The use of these technologies in the US has already shown that they are used to restrict the viewing choices of the consumer in terms of the equipment they wish to view on.

**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? . :**

HDCP has proven to be a big issue for both individual consumers and the custom installation industry. The absence of HDCP as a requirement with Freesat and as was expected for Freeview HD is one of the benefits of the platforms.

**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? :**

N/A

**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? . :**

N/A

**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?:**

By agreeing to these changes, this will encourage the use of the current poor implementations of digital rights management employed by the movie industry. Denying these changes would require them to find alternative, consumer friendly ways of protecting their investment (vs. their content) given the importance of the BBC and Freeview as a digital TV platform in the UK.

