

Title:

Mr

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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? :

It may, in the short term, broaden the range of content. In the longer term, it would reduce access to HD content, and would be the first step to proprietising the entire platform. This would undoubtedly harm long-term viability.

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 simply extra regulation.

It would not prevent people copying content, it would simply generate bureaucracy. There would be absolutely no measurable impact in copying.

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.

HD content aside for a moment, it is already difficult enough to get legitimate access to TV listings data. This proposal simply makes it more difficult without impacting illegitimate copying. This would be a further nail in the coffin.

The public should be guaranteed unhindered access to free-to-air broadcasts without being required to use specific hardware from "licensed" manufacturers.

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.

As manufacturers become required to be licensed with more and more IPRs, the costs of manufacturing inevitably rises, and the choice in the marketplace inevitably declines.

The unit-cost of implementing this technology may be slight/non-existent.

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, for the reasons stated at 6.

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?:

Ability to access and decode EPG data from open source software, from accessibility tools for people of different ability, and other access issues are all important.

What is much more important is how much time this consultation is taking away from the introduction of freeview HD. Consumers are still buying HD TVs which cannot receive the proposed freeview HD content.

This situation is incredible and the BBC should hang their heads in shame. Freeview HD should be available NOW and this proposal only holds things up further.