

**Title:**

Mr

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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, I believe that copy protection will hinder the ability of creators to make their programmes freely available via a public service broadcaster.

**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. Making existing SD content available via free to air digital services, including the iPlayer, has not resulted in any significant increase in piracy of that content, or loss of sales of DVDs of that material. As an example, the programme Doctor Who is broadcast regularly on digital services and still sells large numbers of copies on DVD.

**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. Pirates will always find a way round copy protection systems, as they have with the DVD and Blu-ray encryption schemes. All copy protection does is to create an extra layer of inconvenience and potential problems for legitimate users of the content, in this case licence fee payers.

**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. Existing copy protection systems have already been shown to cause problems by disabling legitimately owned content, or downgrading HD signals and digital sound when the correct handshaking signals are not recognised. Consumers are already likely to have a mix of DVRs, games consoles, DVD and Blu-ray players, satellite and freeview boxes sharing cables and connections, and adding the complexity of a copy protection scheme on top of this will cause problems for many people.

**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. It will cause confusion and slow the take up of the service.

**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? . :**

Content management systems are appropriate for subscription services only, not for a public service broadcaster like the BBC

**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?:**

Ofcom should carefully consider the BBC's remit as a public service broadcaster and insist that HD material is made available to the largest number of licence payers, as simply as possible.