

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. Any restriction on the platforms which are able to display HD content dilutes it's viability. "Copy Management" is likely to be available on only a handful of "authorised" devices/platforms thus cutting off all the consumers who have chosen to use other devices for viewing and/or storing their HD content. As these are BBC consumers they will already have paid a license fee and have therefore already paid to view the content.

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. Any attempt to restrict access to BBC content either by encrypting the media itself or by obfuscating the EPG listings will simply hinder the ability of BBC license payers to access this media using equipment of their choice. No DRM system can be made 100% secure and the internet will provide the information to plug any scheduling gaps.

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

No. The ability to know in advance the upcoming television schedule is fundamental in informing BBC license holders about how they can use the service they have already paid for. Any attempt to obfuscate this information will only cause problems for consumers and can only help to drive people away from Freeview and into the hands of the "payview" competition which is BSkyB for HD content.

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

No. Any attempt to hide/encrypt television schedules will break existing devices that can use the EPG to make recording programmes as easy as possible for the consumer. It will not prevent piracy as it can be easily circumvented using other sources of information. It will make it harder for BBC license payers to access content they have paid for.

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. That the BBC is considering the use of DRM shows how out of touch they are with the desires of legitimate consumers. Until recently the majority of online music sales were encumbered by some form of DRM making playing that media on certain platforms almost impossible. Thankfully the industry took note when the public protested and finally in 2009 all major music media distributors dropped DRM entirely. Letting the BBC take a step backward in this regard is inappropriate.

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. DRM always carries a licensing cost and the hardware costs must include additional processing for decryption of content. There are many existing consumers with FreeSAT devices capable of watching BBC HD now - any changes to existing standards may render their expensive equipment worthless.

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 breaks existing hardware which may be impossible to update. It is also a waste of time as the system relies on "lookup tables" to decode the data. These tables will be reverse engineered and available on the internet within months of release, rendering the entire system a complete failure (a waste of time and money). Forcing customers to pay more for new HD equipment will NOT promote a switch to HD viewing, quite the opposite.

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? . :

This is a question for the other HD broadcasters.

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?:

It has been proven over time that DRM systems come with a cost that is unacceptable to the viewing public (or in this case the paying BBC license holders). It has also been proven, repeatedly, that DRM systems can be circumvented, and this will be no exception, which means from the outset this promises to be an expensive failure. Any attempt to add DRM to HD content will drive consumers away from it altogether - most do not have televisions capable of displaying full HD resolution and will not notice a loss of quality if forced to stay with SD.