

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, I'm not aware of any content which has been withheld by it's rights holders due to these issues and I can only imagine that the chances of this would lessen over time. In America rights holders' demands for copy protection were not met but they did not withdraw their content as they threatened to do. I can't see how the DTT platform's long term viability could be anything other than damaged by 'copy management' (DRM).

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. The most effected content management system would probably be NDS VideoGuard, but the only reason this has not been considered is that it would be illegal and rightly so. The only thing the BBC's proposal has going for it is that it might exploit a loophole these laws and rules although it certainly seems to go against their spirit.

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. By design it would make many legitimate uses of the content impossible. There is no DRM scheme which does allow all legitimate content use by consumers. This is illustrated by the dwindling of DRM by online music retailers. They have learned the lesson that consumers are confused, irritated or angered by DRM. At least they have the chance to go elsewhere for their music. UK TV viewers only have one BBC, so no option to go elsewhere.

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? . :

This may be true. It is not a major factor in this issue.

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? :

This may be true. It is not a major factor in this issue.

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? . :

I'm not an expert in the regulations in this area, however I doubt that non-public-service broadcasters would need this kind of scheme. Surely if they wanted to encrypt their data they could do it however they liked. They would shoulder the risk of alienating viewers by doing so.

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?:

This proposal benefits only big-business, namely content owners and hardware manufacturers. It does so to the detriment of software developers, small companies and television viewers. Big-business is influential enough to look after itself. Ofcom ought to be more concerned with protecting the interests of viewers and smaller companies who are not