

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? :

I don't agree. The BBC is able to broadcast Standard Definition (SD) content without any form of copy protection or copy management. Why should it require additional measures for High Definition (HD) 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? :

Restricting the program guide etc. is better than encrypting the whole content, but they don't require encryption and copy protection of SD content, why is it required for HD?

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

Copy management will reduce the availability of the content to the consumers. This copy protection will only serve to placate the rights holders and gets in the way of fair use of the

content by citizens and license fee payers.

As is the history with most methods of content protection, this will get in the way of legitimate users, but will prove no hurdle to people wishing to abuse the system who will quickly manage to bypass it.

This will leave legitimate consumers either having to purchase special equipment as open source software will not be able to interoperate. Or be forced into technically breaking the law to view the content they have a legitimate right to.

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?
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No.

It will increase the complexity of devices required to view such content and as such increase the production costs and hence increase the cost of these devices to the consumer.

It will increase the interoperability difficulties, which can already be complex in modern HD systems.

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,

Requiring a private key, such as this technology requires, will block out users of open source software as they will not be able to include the key.

This will increase the development cost of HD receiving hardware as it will not be able to re-use open source software projects.

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 don't know what the other requirements are to be able to comment.

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?:

The BBC is publicly funded. Its output should be publicly available in the UK to all consumers.

As license fee payers we should not be forced to accept DRM preventing legitimate use of the content.

We should not be forced by the BBC to have to buy more expensive and restrictive receiving hardware.

The BBC should be a public service, not a service that is restricted. If they cannot secure HD content that can be publicly broadcast then simply don't broadcast the content. I would rather they sourced content in a sensible way rather.