

**Title:**

Mr

**Forename:**

Scott

**Surname:**

Hilleard

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**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:**

The BBC has been able to offer a broad range of content for the last 50 years without copy management schemes and this has benefited consumers due to manufacturers and individuals being free to create new devices through which to consume television. Copy management schemes act as a barrier, limiting who can create devices for receiving content and prevent many home grown and open source solutions from being possible and require consumers to purchase expensive "sanctioned" devices from authorised companies. The BBC should focus on creating quality programming for the licence payers and not be pandering to corporate interests.

**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 strongly disagree with this. Copy management limits the rights of licence payers to use any device of their choosing to record programmes for the purpose of time shifting (especially open source PVR software such as MythTV) and essentially only allows a limited group of companies to produce devices that can receive DTT. Ultimately this stifles future innovation as only authorised hardware will be able to decode HD DTT streams. Copy management systems also require extra decoding hardware which increases complexity and cost of a system, which itself can slow adoption and lead to HD content on DTT being less viable.

**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. Again this proposal will restrict consumer choice and increase end user costs.

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

No. Restricting access to the EPG to only "supported" systems will limit licence payers legitimate usage of HD content. Free and open source PVR solutions would no longer be able to operate and only large corporations would be able to produce such devices, which they can charge large sums of money for, hindering the adoption of HD DTT.

**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? :**

I believe that this will prevent legitimate uses of HD content because only devices which implement the copy management system will be able to decode content. This prevents open source solutions and potential future innovations people have not yet thought of. The system seems to be designed purely for the interests of corporations and assumes that the licence payers are thieves and not law abiding citizens.

**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? . :**

I think that it will have a detrimental impact on the cost of equipment and interoperability with other consumer HD equipment as it is artificially creating a technical barrier that increases complexity and therefore raises costs that would otherwise not exist or be required. The analogue terrestrial television has been highly successful and become very widespread because it has no requirement for copy management schemes and no artificial barrier to entry.

**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? :**

I am unsure what stakeholders opinions are.

**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 am unsure what the requirements of other HD content broadcasters are. They seemed to be profitable with the current lack of copy management however.

**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?:**

Copy management systems seem to be more about restricting the market to maximise the profitability for corporations than protecting consumers legitimate uses of HD DTT. Ofcom should be seriously asking why after 50 years of successful terrestrial tv the BBC suddenly feels the need to implement copy mangement to "protect" consumers?