

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

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

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

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

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

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

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? :

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? . :

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?:

I absolutely object to the BBC being granted any use of DRM or similar 'content management' technologies for any of its broadcasts financed by the television license. I believe it is my right as a license fee payer to have the widest and easiest possible access to BBC content that I and other license fee payers have paid for; I believe DRM contravenes this right and will be strongly detrimental to my access to BBC content in the future. I believe that I should be able to access this content as easily as possible, without being restricted to a specific closed-source technological platform. In addition I believe it is my right to make recordings of BBC content for personal use, and to be able to transfer these recordings to other devices/media for reasonable personal use, without imposed restrictions. Using DRM would deny me this reasonable use.

As a wider point I believe that DRM as a concept has proven to be ineffective; many other industries (e.g. music & iTunes music store) have realised this and moved away from its use. As a technology I also believe that due to its unpopularity and (from the legitimate end-user's perspective) arbitrary restrictiveness it is not a concept that Ofcom or the BBC should support, or ultimately one that will succeed for BBC broadcasts. I also believe that many previous DRM technologies have been circumvented or broken, therefore do not believe that DRM on BBC broadcasts would ultimately be likely to meet the BBC's objectives for its use. With regard to protecting the intellectual property of content providers whose content may be broadcast by the BBC, I believe that their best interest must be to have their content available to the widest number of customers with the lowest barriers to access. Any move against this will only lead to a reduced customer base, and disgruntled potential customers annoyed or frustrated by restrictions imposed on legitimate access to BBC broadcasts.

Finally I believe that content providers are wrong to assume that the use of DRM guards against lost sales. I believe this is based on the assumption that the consumer values the content available at the retail price, so if the content is only available in the format they want at the retail price, they will pay that price. Therefore, if for example I am able to transfer BBC recordings to a portable device (in addition to watching it live on television) then the content provider will lose sales to the value of the retail price of the portable version of the content. I believe this assumption is false; I believe that the majority of consumers in such a situation would not purchase the content, in objection to the restrictions placed on the content, and that the additional loss of future related purchases from those consumers is a greater loss than the actual loss in sales of the original content. Overall, I believe that DRM is

detrimental to the business interests of the content providers, so should not be something they use.