

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? :

Disagree.

Copy management implies closed platforms and those are never viable in the long term. DTT has been very successful in the UK precisely because it is based on open standards.

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? :

Disagree.

The claim that restricted access to EPG data is an effective means of protecting content transmitted openly is absurd to say the least.

If the BBC and/or the rights holders want to restrict access to content they should do exactly that (even if it means that content will not be available on HD DTT). It would be totally inappropriate to restrict the EPG data for such a purpose even if it was effective.

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

Disagree.

EPG data transmission MUST be open to ensure interoperability.

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

Disagree.

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 opinion.

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? . :

Disagree.

Already deployed equipment would be de facto incompatible of course, and adding BBC's proposed content management technologies to new products will have significant costs for manufacturers which would have to be passed on to the consumer.

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? :

Speaking only for myself: disagree. I would not purchase an HD DTT receiver if its operation depends on access to closed EPG data under such licencing arrangements.

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? . :

No opinion.

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?:

Please consider interoperability issues beyond DTG members. For example, open source projects such as MythTV, Elisa, Freevo, Moovida would be rendered useless by the BBC's proposal.