

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. Creativity does not require restrictive formats to thrive. An example would be the music industry, which while making a lot of noise about piracy, has seen an immense surge in profits through a (now) largely unrestricted online marketplace. Indeed, CDs before MP3s had no copy protection and you'd never be able to prove that their lack of DRM did anything to outweigh the format's benefits.

I would argue that the sheer costliness of an encryption system would put more limits on the lower end of the production market than it would save even at the higher end through so-called "lost sales".

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? :

As a consumer I can only point out negatives. The largest (for me, personally) is the fallout from having secret decryption keys, annihilating any chance of there being an open-source solution for watching TV.

As a license fee payer, I don't see why a portion of that money should be being invested in a technology to limit what I can do.

If DVD vendors take issue with this, that's not the BBCs or our fault. It's totally their prerogative to ensure that they deliver value, not that we shackle an existing service to make it worse.

By supporting DRM, we're seriously starting a race to the least available, least accessible content for the consumer.

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

Of course not. Encryption on the EPG are just as bad as hard video encryption.

I would go further to say that EPG data is probably uncopyrightable because it's always going to be within the realms of fair dealing (re CDPA/1988) as a news report of what's going to be on TV.

Trying to push encryption through this route is totally against the spirit of current rules.

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

I think we need to redefine the conditions so as long as anything classed as "free" is actually free (with no encryption of any kind), allowing encrypted pay-per-view on any multiplex is okay.

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? :

Its safeguards already miss a large swathe of users who consume media through a media-centre computer. These quite often run an open source operating system and the BBC's plan is just plain incompatible.

Let me be clear: these are ordinary people who would like nothing more than to consume the best version of the media totally within the bounds of what the BBC feel the need to enforce.

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? . :

No, it also has a hugely negative effect on the way software has to deal with these streams.

And then there are all the people with integrated DTT solutions that would need upgrading too (so the price of the screen on top).

Again, this is something we just don't need.

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? :

Both sides of crypto need significant hardware. You need beastly machine to create the video for sending and extra hardware at the consumer side to decode.

We're talking about hardware that just wouldn't be needed if encryption wasn't used. Surely this is money saved that could rebudgeted by the BBC to make content deals.

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? . :

Pass.

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?:

Open source. Open Source. Open source.

It's amazing stuff but plans like this really threaten it.