

Title:

Mrs

Forename:

Surname:

Williams

Representing:

Self

Organisation (if applicable):

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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:

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? :

Not necessarily. Would the effect of a refusal by the BBC to accede to the demands of a section of content providers lead to a boycott of the BBC as far as HD content goes? The BBC is a huge market for them. Witness how iTunes has now gone DRM free after pressure from consumer demand superceded the desires of the established record labels.

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? :

I do not agree that going forward a content management system is either desirable or ultimately sustainable in the face of technological advancement.

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

I do not.

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? :

For the majority of users perhaps. However users who wish to be who wish to use open source devices will be barred from the same rights as the majority despite paying the same license fee.

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 I do not and I take issue with the premise of 'cost' in this sense. One must also take into account the cost of barring competitors entry to the market.

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?:

The argument that the BBC puts forward is that we should accede to the content producers' bluff that they will deny HD content en masse to the beeb, thereby shooting themselves in their foot. Eventually just as has been seen recently in the music industry it will be realised

that the use of force to control media inevitably leads to ever more determined efforts to free it - either for nefarious motives or, as in the music case, by new business explicitly setup to service the consumer demand for open and DRM-free content supply. The same delay of several years between the restrictions imposed and their removal as was evidenced in the music download market will only lead to money being poured down the drain as the BBC jams its Huffman finger in the dyke.

Colour television was not subject to special treatment when it was introduced. No doubt it will be argued that the internet and the ability to share content was not a threat in those days. Logically we should apply safeguards to the colour stream now too. If not why not? In a decade will we see more stringent restrictions enforced when UltraHD is introduced? Will the DRM from the then 'ordinary HD' be then removed? Or will it remain as many suspect to create a further tier. I believe this proposal has little to do with encouraging access to quality programming or encouraging user content but rather more to do with monetising each and every viewing of a particular piece of content rather than the channel subscription model hitherto in place which favours the BBC in the eyes of commercial content providers.