

**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. It will be an inhibitor and is counter to the intent of Freeview.

Who is to say how Freeview is delivered? It may be to an integrated TV with Freeview receiver or a set top box or indeed a software implementation on a PC running only the most basic of RF and decoding in silicon. Therefore to meet the concept of "Freeview" the algorithms need to be public and therefore easily circumventable.

Also there is HD kit already on the market. This would cause interoperability issues and once again show a complete lack of joined up thinking re broadcast in the UK.

Finally if Freeview continues to support set top boxes or TVs to expose content for recorders etc then HDMI can be intercepted and the content made available. So unless the plan is to content protect the entire eco-system this is unlikely to be a successful approach

**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. No content management. Especially from the BBC

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

No

**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? :**

No. See previous comments.

BBC and others should not be broadcasting material that the citizens need to be protected from.

The BBC is a publicly owned body therefore the content it produces is publicly owned and paid for.

The lateness of this proposal to virtually retrofit content management is too late for the market which has HD Freeview settop boxes and TVs available

**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.

While it may only add a few pounds to the costs of settop boxes or TVs there is also a significant number of products in the market and being sold. By the time this gets through consultation and technical work done and products updated there will be significant product in the field. Who is going to update or replace it. I suggest the BBC pays for all the costs it inflicts on the consumer if it gets this unnecessary revision through

**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? :**

See previous comments

**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? . :**

Doubtful. Every customer I have worked with re DRM needs something different. I suspect the BBC is equally quirky

**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?:**

Its too late for such changes. These should have been suggested years ago.  
This proposal should be kicked out