

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.

The question presupposes that the content would not be available without the proposed DRM system which I do not believe would be the case.

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 - in fact I think it is entirely inappropriate that the BBC should allow itself to be controlled by the DTLA.

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? :

The question again presupposes that certain digital content will only be available if the BBC accedes to the demands of the rights-holders to incorporate restrictive DRM systems.

I do not believe that a huge market which UK DTT represents would be boycotted due to the absence of DRM restrictions which would in any case not apply to the same material in other territories.

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? . :

I find the phrasing of these questions biased towards the wholly negative outcome of having DTT HD copy protected.

Technological restrictions may not have a huge impact on the cost of receivers but will impact negatively upon the development of open-source development in the area of digital broadcasting.

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? :

No, the negative effect will be considerable when consumers understand that the BBC has agreed that it has put the commercial interests of content producers (many outside of the UK) far ahead of those of its licence payers.

What consumers would consider common practice or fair use would become impossible or require circumvention of the technological restrictions.

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 comment

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 believe that the uptake of these DRM systems is contrary to the public service remit of the BBC and will undermine the legitimacy of the whole licence fee supported model and so should be rejected by OFCOM and the BBC.