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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? :

No. What it will do is put us at the top of a slippery slope. Content producers will not simply stop selling content to the UK because the most popular digital TV platform does not

implement DRM. If only because a large chunk of cash will suddenly vanish from their income. Additionally, DRM has historically only inconvenienced the legitimate users; the HD content the producers are trying to protect will most likely already be available for download on the internet anyway. It is a waste of money and resources to implement it.

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? :

Assuming a broad understanding of the word "appropriate", no. Given the price point that set-top-boxes target and the need for PC-based DVB-T2 tuners (such as already exist for DVB-T) will mean the selected method will be broken into within a very short period of time, making the whole exercise pointless.

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

No. Closed formats and/or DRM lead to fragmentation, wasted money, and disappointed content providers (because they've spent money on something that doesn't work) and consumers (because some arbitrary restriction has been applied to them after the fact.)

What's more is that the request to allow the metadata for the EPG be "closed" is simply a back-door way of implementing encryption and DRM of the whole content without actually saying so much.

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

No, for the same reasons I have expressed above.

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, there is no logical connection between the implementation of DRM and the safeguarding of citizens. The only thing that is safeguarded is the ego on content producers, and ultimately they are disappointed.

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 will cause the rate at which the receivers will fall in price to be stunted, due to the custom requirements of receivers for the UK market. This can vary from different and/or extra silicon costs, as well as engineering costs, management costs, insurances taken out by manufacturers in case they get sued for making it too easy to hack, etc etc etc.

It will also make open-source and free software implementations of the otherwise open DVB system infinitely expensive, ie not available at all. Even the BBC's own internal TV archiving system (BBC Redux) depends on such open-source and free software.

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?:

Specifically, the open-source question, and the question of the slippery slope: what will these layer of DRM enable them and other broadcasters to do technically in the future that many will find repugnant compared to what they'll be able to do that consumers will love?

The only thing in the whole debate that the BBC are offering as advantages to the consumer is that content producers will be willing to actually deal with them. To think that content producers will simply ignore one of the world's largest economies for squeezing money out is as astonishing as it is dishonest.