

**Title:**

Mr

**Forename:**

Benjamin

**Surname:**

Nortier

**Representing:**

Self

**Organisation (if applicable):**

**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. Copy management will most certainly do the opposite to the long term viability of DTT. Copy management has never, and will never be in the interest of the long term viability of any platform. Copy management does nothing but punish legal viewers, since circumventing DRM is always almost trivial, and illegal consumers of content will not be encumbered by these measures.

Open standards ensure long term viability. Having a special standard for one country will most certainly shorten the lifespan of DTT.

**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

**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. Content management has got nothing to do with safeguarding citizens, and everything to do with protecting profits and creating vendor lock-in for content producers.

**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. This is a ridiculous statement. Implementing special content management algorithms in devices will most not have a negligible cost. The total cost of a specialised device is much more than the manufacturing cost of a single device. Specialised products by manufacturers that sell devices all over the EU and the world incur costs for transport, factory retooling, staff retraining, shipping, and customer support. Specialised devices destroy the economies of scale that are the foundation of success of the EU.

**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.

**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?:**

As the BBC is a public broadcaster, it should not now or in future apply content management to any of its broadcasts. It already applies content management to its iPlayer service, which makes it impossible to view content that I should legally be able to access, inaccessible from my open source viewing device.