

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, I do not. DRM as a technology has been rejected by a number of industries, for a number of reasons.

1. It is not technically possible to distribute content to an end user for playback while preventing them from accessing that content for nefarious purposes. It's akin to giving someone a locked box and a key, and then trying to ensure that they can only open the box to look at the contents, not remove them. This is an analogy, but the underlying contradiction can be clearly demonstrated through application of BAN logic.

2. As a result of 1., the standard approach to DRM is to obscure the mechanism by which content is decoded, or the key used to decode it, to prevent it from being migrated. This will frustrate the majority of users who wish to migrate the content to other devices, but will not prevent technically adept users from accessing the information.

3. The distribution model supported by the internet requires only one user to circumvent the DRM, after which point it can be widely distributed using swarming protocols, or via older extant distribution networks such as FTP and USENET.

As it is not possible to secure the broadcasts, and hence not possible to prevent these from being distributed online, the imposition of DRM on end users has reduces the functionality of their current systems for no gain.

It should be noted that frustrations with DRM are cited in a number of situations as a driver for unauthorised access to media online; if it were not so tragic, it would be a comic farce that

a technology intended to reduce unauthorised distribution actually encouraged and increased 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? :

I do not believe that this question is relevant, given that the underlying premise is flawed.

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

I do not believe that this question is relevant, given that the underlying premise is flawed.

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

I do not believe that this question is relevant, given that the underlying premise is flawed.

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, I do not.

Additional guarantees are required to safeguard access to digital television from open source operating systems such as Linux.

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? . :

Interoperability with open source operating systems such as Linux needs to be guaranteed, and available in a manner which does not compromise the operating system. For example, a binary-only kernel module which acted as a 'black box' to handle the DRM would not be appropriate. A full description of the DRM in place such that an open source decryption module could be implemented would be more acceptable.

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? :

I do not have a view on this subject.

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? . :

I do not have a view on this subject.

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?: