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Representing:

Self

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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

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? :

It adds security to the system which is (for the most part) not available. However whether it is active is as yet unproven. Other much more complex and potential secure DRM systems, such as Blu-ray, have failed in the past. History shows that most DRM systems are subverted within days of release, so it seems there will be little 'benefit' for some considerable annoyance to legitimate users.

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. As stated for Question 2 the system will not provide any extra security for content producers and would serve to hinder consumers of HD content. Restrictions would include the ability to move the content to alternative playback devices following recording on a PVR, the use of 'niche' PVRs for example Windows Media Centre and MythTv. Both of which are currently HD Freeview ready but with this new level of protection will be unable to receive HD content without significant (and not guaranteed) updates. Many consumers have purchased expensive systems based on the ability to receive Freeview HD with them.

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. Interoperability with other HD equipment will doubtless be affected as much of this equipment already exists and is unlikely to be updated with new security systems. HD DTT receivers used in computers will require new software which will not be available for sometime, if at all.

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? :

Yes. HD DTT receivers will be created to work with the new system, however other devices sold on an international market may not be able to work with a UK specific system

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? . :

Don't know.

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?:

Archiving of TV content on devices other than a PVR for playback on a range of devices throughout the home is a common usage pattern, not the popularity of home Network Attached Storage systems and Set-top boxes to play back content from them.