

**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. DRM protection adds cost and complexity to both the equipment and the media. It creates a closed cartel of suppliers that have signed up to the restrictive terms imposed. Just about all attempts at DRM implementation have been broken at some point, thus requiring continuous 'improvements' to be made to the DRM, which are likely to cause older equipment to lose its ability to play newer protected content. Furthermore, the offshore rights-holders that have threatened the BBC with loss of access to HD content have failed to impose their will in other countries, so they continue to provide DRM-free HD content in those countries to avoid loss of market share. Why is the UK any different?  
Many music sites have abandoned DRM without suffering a loss of available content for the same reason.

**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. It does not allow the use of open source TV capture/playback software to be used on a computer and prevents transfer to a PMP or other device for convenient playback. It pre-supposes that every UK license fee payer is a potential criminal that can't be trusted. There must be a full "fair use" policy that doesn't encroach on the citizens freedom to use content they are entitled to see as license fee payers.

**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 requires the purchase of products that cost more because the manufacturers had to pay for the DRM IP license. The encryption overhead would also require more CPU power for whatever equipment is used (adding to the carbon footprint!)

There have already been a plethora of HDMI standard revisions with resulting compatibility issues for HDCP compliance. This is adding yet another layer of complexity. Indeed, some TVs and TV receiving equipment have already been sold as 'HD ready' on the assumption of future DRM-free Freeview broadcasts following in the footsteps of other countries.

It appears that the UK is alone in capitulating to the demands of the rights holders, This means that only sets sold in the UK would have to be 'customised' in this way, adding costs that manufacturers cannot amortise over global sales.

**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. As stated before, the implementation would be a 'UK special' due to the BBC being the only broadcast organisation willing to capitulate to the demands of rights holders. This requires manufacturers to treat the UK market separately from the rest of the world, and it would be impossible to use TVs bought in other EU countries for example. This opens the door to price hikes in the captive UK market. As stated before, only the big name manufacturers that can afford to join the exclusive DRM cartel of DRM-approved suppliers will be able to make and sell receivers for UK use.

**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 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?:**

One has to ask why the UK is being singled out as the only place where rights holders are unwilling to provide DRM-free content, other than because the BBC is foolish enough to give in to demands that have been flatly rejected in other countries