

**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.

If anything copy management would lock us into DRM technology that rapidly grows antiquated (take Microsoft's PlaysForSure as an example) that would shorten the long-term viability, though I hardly think this is should be a major concern.

Regarding range of HD content, despite threats, I fail to believe HD content will be withdrawn without DRM, which is what your question implies.

**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? :**

A weasle-worded question. Content management is simply not welcome.

If you ask someone whether we should bring back hanging, it's hardly reasonable to ask at the same time about the best way to hang people, when you don't know their position on the whole subject.

Even the BBC's own Graham Plumb (champion of content management) admits that it is never going to be possible to prevent content mangement from being circumvented. So why bother?

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

Encrypted EPG is a shocking idea. Not only do you want to DRM the programmes, you want to make sure only approved manufacturers can know what's going to be broadcast.

The EPG information is only of interest to licence fee payers, and no one else. I absolutely fail to see how encrypting this data can be of use to a single person.

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

See question 3.

**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 agree at all. And again another weasle-worded, loaded question.

This proposed approach would do quite the opposite of safeguarding our legitimate uses by deliberately restricting us to those uses deemed commercially viable by approved manufacturers.

Additional guarantees would be the removal of any content management to allow us consumers to dream up new and exciting legitimate uses, or buy cheap off-the-shelf solutions from manufacturers who haven't had to hike prices to pay for the honour of being "approved".

**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? . :**

Absolutely not. Implementing such a system in hardware would not be easy, that difficulty comes at a price, a price which consumers will have to pay.

**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. I believe this will prevent free and low-cost solutions (including, but not only, open-source) from entering the market.

**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 think the answer depends on which other broadcasters?

**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?:**

Adding content management to HD (and HD only) seems a waste of time and effort, will increase the cost to the consumer, reduce consumer choice for compatible devices, and will even fail to solve the issue (if it even exists) which it sets out to resolve.