

OFCOM Consultation on ‘Content management on the HD Freeview platform’

Response to the consultation from the British Film Institute

We welcome this opportunity to comment on the proposal from BBC Free to View Ltd concerning the inclusion of content management technology in receivers for HDTV services on the Freeview DTT platform.

Our concerns in this matter relate directly to the BFI’s role as the designated National Television Archive and our initial anxiety that the content management technology proposals would restrict our ability to capture television programming for preservation and future access for research. Were this to be enacted, it would undermine our ability to fulfil the archiving provisions for the commercial public service broadcasters in the Communications Act 2003. It would also have an impact on the access services we have provided to BBC output since 1990 which were set up to meet the BBC’s archival access obligations first agreed in the 1986 Charter and Agreement

We have been in discussions with the BBC about these proposed changes and have been reassured that a licence to software will be provided free of charge to the BFI and other trusted bodies by the BBC. This will enable us to use the otherwise encrypted EPG data in the content management technology so that we can achieve the archival purposes enacted through legislation and agreement.

In the light of these undertakings we have no objections to the proposed amendments to the licence for Multiplex B. Furthermore, we concur with OFCOM’s that these proposals are the least intrusive means of achieving effective copy management and ensuring the delivery of a wide range of content to citizens and consumers.

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