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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. In 2003, rights holders threatened to boycott HD TV in America if DRM was not implemented. A federal judge ruled that the FCC could not mandate DRM - but the

threatened boycott did not happen, and DRM-free HD TV is still available in America.

DTT is a strong platform - many people have purchased new TV aerials to be able to receive Freeview. But restricting broadcasts to people who have purchased DRM-compatible hardware will not improve its viability.

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. It is not clear that HD DTT requires a content management system.

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 is not clear that HD DTT requires a content management system.

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? . :

As a consumer I have no idea of implementation costs. However it is clear that because it is extra functionality, content management/DRM will incur costs in development, debugging and interoperability testing - and these will doubtless be passed on to the consumer.

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. The licensing arrangement will freeze out small businesses and "one man band" entrepreneurs and will prevent Open Source Software implementations.

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? . :

It has not been reported that the quality or quantity of HD TV output has suffered due to a lack of mandated DRM. Therefore it must be concluded that a requirement for DRM is not necessary.

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?:

Yes.

1. In the past DRM has failed to prevent unauthorised copying of content (both audio and video) and the use of DRM is receding, e.g. Amazon MP3 downloads are DRM-free from the start; Apple's iTunes dropped DRM a year ago.
2. The BBC states that the majority of programmes would be DRM-free. But there is nothing in its proposal that prevents it changing that in the future.