

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. It threatens the platforms availability due to the restrictive licensing on the DRM components excluding open-source software from interfacing with the system.

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. Content management like this is pointless. The only thing that it does is stop people recording programmes to watch at home, it has no effect on piracy. Virtually all content covered by DRM is available in a non-DRM, pirated, form. The only purpose of DRM is to stop the 'fair use' of the content. I put fair use in quotes as I believe the specific fair use legal doctrine only exists in the US.

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. These controls by definition limit the use of the content to devices and software which license the DRM scheme. For many devices and software classes this will be impossible due to cost or licensing restrictions. There is no solution to this other than removing DRM.

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? . :

Can't comment on this.

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? :

Can't comment on this.

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? . :

Can't comment on this.

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?:

The use of DRM in public broadcasting is wholly inappropriate. It does nothing to affect piracy, it only artificially restricts the ways in which the license payer can legally use the content via licensing.