

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:

The BBC should be focused on supporting content providers who are willing and capable of meeting the demands of their viewers.

Those content providers who are unwilling to license their products without DRM should simply not be "rewarded" with any purchases. Publicly "outing" such suppliers so as to "name and shame" should be implemented.

In this case the BBC acts as a "procurement agent" for and on behalf of US ALL, and should ONLY purchase those products or services that meet OUR needs not those of the industry.

In the event that there is insufficient content available for the BBC to broadcast as a result of NOT implementing DRM - then the BBC should commission ORIGINAL UK SHOWS from UK CONTENT PROVIDERS, not cave to industry pressure.

Going forward, technology develops at such a pace that inexpensive home computers capable of HDTV editing will be with us soon it they are not already.

By locking the content behind DRM we will the British public will be deprived of a future VALUABLE resource for re-purposing, reuse or recycling.

People are already angry that only just having upgraded to digital they are facing MORE costs to receive HD.

Now you want to add DRM and reduce the value to me of what is broadcast to practically zero ?

If I cannot play or transcode my recording on my existing equipment, then the value of that DRM protected content to me as a consumer is exactly ZERO and not even worth the bandwidth you will use to broadcast it.

And you want me to be happy about it ?

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 as DRM has proven time and time again to be anti-consumer and thus anti-business.

Just a look at what the most famous players in digital audio content are doing would tell you that.

iTunes says it all - the move to content WITHOUT DRM Apple experienced a HUGE upswing in takeup.

Same with Amazon's MP3 offerings.

With DRM I would be forced into obtaining my content from unofficial sources so that I can still watch it on any device I select, at any time of my choosing.

Droves of people will be forced into obtaining their content through unofficial sources.

Just how do you expect the BBC to compete with "FREE of DRM" and "FREE of cost" ?

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 as a content management system is neither required nor needed.

DRM just complicates matters and will inevitable lead to it being targeted by hackers.

If the combined might of Hollywood cannot protect Blu-ray - how do YOU propose to do it on the BBC's budget ?

This is an EXPENSIVE technical battle that the BBC is FAR better keeping out of.

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? :

The section regarding the DRM is ambiguous at best.

"1.9 The content management technology required to be implemented in receivers under the BBC's proposals would permit unrestricted recordings of HD content onto digital video recorders (DVRs) but would enable broadcasters to control the copying of this content onto other devices and its distribution over the internet. The HD content would only be accessible on other consumer devices which support the same content management technologies as those used in HD receivers."

How can the recording be UNRESTRICTED yet the "broadcasters to control the copying of this content onto other devices and its distribution over the internet" ?

If what devices I can play my recording back on is not under my control - how can this not be a restriction ?

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 I most certainly do not. It would probably eliminate a whole class of products whilst decimating our viewing options.

I can not see a clear way for hardware manufacturers to produce "add ins" that provide TV functionality to a PC. As they cannot guarantee the "safety" or "security" of the platform for those who REQUIRE DRM.

This would essentially exclude all home users from creating "HD mashups" which are FAIR USE.

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 see Q6.

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? . :

Don't know - no comment.

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 - just take a look at the DIY PVR scene.

This is where people take "consumer" parts and build their own PVR/DVR.

Examples :

<http://www.mythtv.org/>

<http://linvdr.org/projects/linvdr/index.en.php>

DRM requirements would make such community projects untenable for HD content and rob the British public of their viewing choices.