

**Title:**

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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.

I believe content producers will continue to sell to terrestrial channels regardless of DRM implementation. I do not believe this will place FreeviewHD broadcasts as a disadvantage, as the only free-to-air broadcast seen by the vast majority of the public, no producer will restrict their audience. As a result, FreeviewHDs long-term viability is assured.

**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? :**

partially - most consumers will find their content is protected, however as we've seen with other systems, these will be "cracked" in next to no time and copy-protection circumnavigation software will quickly appear, making the whole concept pointless.

**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. As in answer 2, copy-protection is too easily broken.

Even with unrestricted copy and multiple-copy modes available, other systems would need to implement the same DRM 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? . :**

No. Interoperability with other equipment will be negatively impacted. For example, once recorded onto a PVR I may choose to transfer that recording to a media library. These systems do not generally include the DRM mechanisms as they are sold cheaply. A Popcorn Hour box (or one of the many similar devices) would have to be re-purchased if it did incorporate the DRM protection, which I doubt would be forthcoming as these are mass produced for global markets, not solely for the UK market.

Also consider regional encoding on DVDs, and how that simply produced 'multiregion' players. That was driven by the need to mass-produce competitively priced multi-market

players. With regard to FreeviewHD DRM, it simply adds more cost to the manufacturers who may see it as an option to increase the cost of players to a captive UK-only audience.

**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? :**

Partial, all FreeviewHD receivers would be impacted, but as there are none yet, it would have a negligible effect on these devices.

However, see Answer 6 - the cost of the devices may be negatively impacted as manufacturers see the inclusion as a way to keep the price of playback devices high.

**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? . :**

Unsure.

**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?:**

I'd like to reiterate the fact that DRM does not stop piracy of content - you can see this today with DVD, BluRay and other systems that can be downloaded from the internet. As a result, implementing DRM on FreeviewHD would only inconvenience legitimate consumers.

In addition, we currently pay for content on terrestrial channels through advertising or the licence fee. Implementing DRM so that consumers need to buy the DVD/BluRay media is simply asking us to pay twice.