

**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

**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? :**

It may be so, but content management is irrelevant, as it will be circumvented by those with a mind to do so, and will only hamper or restrict the honest citizens trying to use the facilities / programmes in ordinarily fair ways.

**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? :**

It may be so, but the argument is flawed, as content management will be circumvented by those with a mind to do so, and will only hamper or restrict the honest citizens trying to use the facilities / programmes in ordinarily fair ways.

**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. If it makes it necessary for manufacturers to produce a specific model for the UK, costs will be incurred and therefore passed on to customers. As retail prices are usually percentile increase based on wholesale costs, the price uplift will be exaggerated.

**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 probable higher costs will inhibit the market.

**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? . :**

Cannot answer as this is only within the purview the other HD broadcasters

**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?:**

"Content management" is a form of technical restriction that will assuredly be circumvented by those with a mind to do so. It will only restrict the ordinary, honest citizen by, for example, requiring "him" to buy a suitably modified / specially produced (at extra cost) receiver, without which "he" will be unable to benefit from the HD content. It will not prevent the implied "piracy" any more than DRM has prevented it in the music CD and DVD market. Its additional costs, therefore, are unjustifiable, except to those who wish to take up the electronic and programming challenge for intellectual reasons (they like playing with the technology).