

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, I do not. A large part of media consumption taking place on consumer electronics today involves the recording and storage of visual media such as broadcast television, and new HD content should be no exception. Even with a system of enforced deletion after a period of time, such as that employed by Apple's iTunes Movie Rental service, the consumer is not given the flexibility intended in the spirit of such recording and on-demand technology.

The only other viable way for high definition broadcast television to be viewed on demand, in the same way as intended by new consumer devices such as PVRs and recording scheduling, is via the internet. However, for the vast majority of the UK, using these services such as BBC's iPlayer is unreliable, slow and difficult due to the poor state of the broadband network in this country. This becomes near impossible when dealing with high definition content. Therefore, consumers deserve the flexibility to make recordings and copies of those recordings for their own use without being restricted by the technology they use to create them.

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, I do not. Content management systems have a long history of being unsuccessful in their aims and their implementation and this technology has been proven to be unreliable and unfit for purpose in the context of broadcast television.

Question 3: Do you agree with the proposed change to Condition 6 in the Multiplex B Licence? :

No, I do not. Agreeing with this proposed change would stifle the rights implied to the viewer when the Television License is paid.

Question 4: Do you agree that Multiplexes C and D should be granted a similar amendment to their Licences as Multiplex B?. :

No, I do not. Agreeing with this proposed change would have the same result as agreeing to the change for Multiplex B.

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, I do not. Legitimate use of HD content is in no way in need of being safeguarded against the nefarious use implied in the proposal for the multiplex amendment. In the interests of fairness and clarity in the age of digital television broadcast, the public should be allowed to continue unabated in their viewing habits and should be free to consume media however they wish. To stifle this would be to stifle the viewing habits and media consumption of a nation.

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 do not. This would be a restrictive standard that all manufacturers of related equipment would have to meet, and would only push up development time and costs as manufacturers use it as an excuse to charge a premium. We saw it with High Definition Content Protection (HDCP) on televisions in the early 2000's and the fear is this could prove to be a similar situation, with equipment not supporting the content protection mechanism being 'black listed' for HD viewing and recording.

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? :

I don't know what stakeholders say, but I believe that this would again be an unnecessary obfuscation of a standard which works. If you need to go back on a standard with all the related disruption to devices built upon that standard in order to support another set of standards, there's something disastrously wrong with the way the technology has been designed.

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? . :

No, they do not. I can imagine broadcasters who intend their content to be copied and used in a free way would be frustrated to have to deliver this in another medium, for example in the context of educational programmes. This kind of copy protection should at least never be mandatory.

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. Every person wishing to watch broadcast television in England, Ireland, Scotland and Wales needs to pay a Television License fee in order to do so. This implies certain rights and 'ownership' if you will over the actions and the content that a viewer consumes. Any restrictions on the consumption of this content are against the spirit of this payment and against the spirit of media consumption. It is not appropriate in this day and age, as it will not be in the future, to have to put up with this kind of confusion and restriction. I implore Ofcom to roundly reject this and any other proposal for HD or other content protection on any multiplex used in digital content broadcasting.