

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 believe the threat to remove premium content from UK HD channels by the programme makers is an empty one. The UK free to air market is simply too large for the content providers to ignore.

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? :

Yes. It seems a bit convoluted but I can't think of a better approach that would disallow scheduled recordings whilst allowing live viewing.

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

No comment

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

No comment

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 believe that legitimate use of HD content should include the use of open source software and the unrestricted shifting of content between devices.

As a minimum there should be provisions for the backing up of recordings in a non time-limited manner.

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? . :

To a point yes, as I don't expect set top boxes or TVs will capable of receiving Freeview HD will increase in price as a result.

However, it seems all legal free options for viewing HD content such as open source software for media centre PCs that have decoding capabilities will be rendered unusable.

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 comment

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 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?:

Innovation in set top box user interfaces has been driven in some part by the open source community (eg internet-enabled links to free online content such as IMDB directly from the TV Guide) - if elements of the user interface are mandated by the BBC (such as the TV guide) this will harm innovation.

Likewise, if open source software cannot view HD content this makes it less likely people will use it and reduce the drivers for innovation between competing software products. These innovations (including some that could benefit disabled viewers, for example) will never be made and hence never make it into commercial products. Even worse, if innovative ideas are only released under open source licences such as creative commons and these licences can't apply to software used to decode HD content then it will be impossible for hardware manufacturers to make use of them.

