

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:

OfCom should be considering the appropriateness of content management systems on FTA broadcasting, particularly when it is publicly funded and public service based (such as the BBC) as it is unlikely any of the other parties involved will be interested in the views of end users.

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? :

The long term future of DTT is unlikely to be affected even if some content providers refuse to allow the BBC to broadcast their content in HD. Other services similar to TopUpTV could provide DRM enabled HD content if required and the BBC can continue to broadcast it's own content without restrictions as it does currently. The BBC's remit should not be to provide a commercial outlet for other content providers.

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; If content providers are insistent on using DRM for HD broadcasts there are ways using systems similar to the current TopUpTV service which would not prevent users using unusual hardware (for example PC based solutions) from viewing other HD content broadcast by the BBC. The BBC is not permitted to encrypt it's signal for a reason and this is a poor attempt at circumventing this restriction which would inconvenience end users. If a provider wants DRM then they cannot broadcast their content on the BBC.

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 - the BBC's system will limit the choice of consumers in how they consume content. It is also a concern that the BBC may choose to expand the number of programs to which it applies its DRM system in future. It is also unclear how this system would interact with existing equipment which may use competing DRM systems.

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? . :

Yes - this system will prevent receivers that meet the expected DVB-T2 standard from receiving BBC broadcasts and prevent users using other systems such as PC TV cards that would otherwise be able to receive the broadcasts.

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? :

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? . :

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?:

There are existing methods of content management that do not require alteration of the entirety of the BBC's DTT broadcast system. This is an inappropriate method designed to bypass restrictions on the BBC imposed for good reason to ensure free access to its services by all licence fee payers.