

**Title:**

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Self

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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. To claim so is a barely-disguised scare tactic.



**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? :**

I don't know. I do not agree that a content management system on DTT is appropriate.

**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. Any use of "content management" technology to restrict use of content fails -- by definition -- to safeguard citizens' and licence fee payers' legitimate use of content.

**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. Such restrictive technologies (by design) always present substantial barriers to legitimate interoperability, forcing consumers to either give up using equipment they have or purchase additional hardware and software to continue to do so. Lost time in figuring out new ways to maintain interoperability is also a non-negligible hidden cost.

**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. It's clear that by forcing receiver manufacturer to included these additional content management components in all HD DTT receivers, there will be substantial effect on 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? . :**

I do not know.



**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?:**

The BBC's Charter, under which:

"3 The BBC's public nature and its objects

(1) The BBC exists to serve the public interest.

(2) The BBC's main object is the promotion of its Public Purposes.

[...]

4. The Public Purposes of the BBC are as follows--

[...]

(f) [...] helping to deliver to the public the benefit of emerging communications technologies and services"

It is not in the public interest to have barriers erected to legitimate use of content. Restricting access to the EPG is particularly egregious.

Proposing restrictions on access to HD content in order to prevent certain legitimate uses of this is, in fact, opposite to the BBC's purpose under section 4(f) of its Royal Charter.