

Title:

Mr

Forename:

Duncan

Surname:

Hothersall

Representing:

Self

Organisation (if applicable):

Email:

dh@capdm.com

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. It will make hardware more expensive, cede control to corporate interests and actively work against the long-term viability of the platform.

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 see the need for a "content management system" in this context at all (the term is merely cover for DRM). But if an effective content (rights) management system is to be put in place, it needs to be under the control of the BBC or Ofcom, not ceded to offshore corporate interests.

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

Categorically no. It contravenes Ofcom's and the BBC's *raison d'être*. Introducing a system of restrictions under the control of corporate bodies which are not even under UK jurisdiction would be nothing short of gross negligence by Ofcom.

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

Of course not, for the same reasons.

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, of course they wouldn't. The only interests that this DRM system would serve are the corporate interests of content producers. Citizens and consumers would only be harmed by this system.

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, since neither the US nor the rest of Europe is adopting, or is likely to adopt, these systems - so UK tech will be non-portable, even in the EC, and will need to be custom for the UK market. UK consumers will have greatly reduced choice, and prices will inevitably rise - not because of the cost of the technologies but because of the restricted market into which they will be sold.

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, for the reasons given above.

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?: