

**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:**

Yes

**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. The lack of copy management on free-to-air SD content to date has apparently not been an issue and there is no reason to suppose that it will be any different for HD which will become the norm over time.

**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. Those who wish to copy and distributed content will find a way around the restrictions. Since the AV content itself is not encrypted this will be relatively easy.

**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. For those using open source PVR software such as MythTV as a means of timeshifting content, this measure will slow down the adoption of Freeview HD. Note that the proposed approach will not prevent the use of such software from circumventing the copy management controls since it does not prevent the reception, recording and distribution of the AV content. However it will impede the legitimate adoption of such software as a timeshift solution for Freeview HD, driven by the encrypted programme data.

In time it is likely that the encoding will be reverse engineered in any case, as it has been with Freesat.

**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.

**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? :**

Yes.

**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?:**