

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.

Although the content makers would certainly prefer copy management, I believe that the claim that they would withhold content without it is essentially a bluff. They are currently providing content over freeview and other platforms without protection, and there is nothing fundamentally different about HD content.

In the US, in similar discussions (about the "broadcast flag") content makers similarly claimed that they wouldn't be able to provide content without it. However the broadcast flag hasn't been implemented and it doesn't seem to have had an impact on the content available.

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 it were desirable to implement content management (which I don't believe that it is), then it needs to be done via a proper encryption mechanism. The proposal is fudged to avoid "encryption", and results in a totally flawed system that would be broken almost immediately after it was released. The result would be restrictions for honest people using legitimate equipment, but there would be no impact on people who wanted to pirate the content.

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.

I can see no reason for any further technical restrictions on content management. The current systems are entirely adequate, and provide the consumer with a lot of options (as they should have) for using 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.

It will have a minor impact on the cost of HD DTT receivers produced by big name brands. But it will make it impossible for DTT receivers to be built based on open platforms,

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.

The most important stakeholders are taxpayers and license fee payers. Most of these do not care or aren't aware of the proposals, but those who do overwhelmingly believe that this the Huffman Code scheme would be fundamentally impossible to implement in open systems. (Based on response to your previous consultation).

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'm not aware of the requirements which broadcasters claim to have.

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?:

Ofcom should read the results of the previous consultation again, and should not insult the public by merely coming back with fundamentally the same proposal.