

**Title:**

Mr

**Forename:**

Nathan

**Surname:**

Reynolds

**Representing:**

Self

**Organisation (if applicable):**

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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?:**

Forename, Surname, and Email.

**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? :**

I disagree, 'copy management', A.K.A. Digital Rights Management (DRM) would cease to be an issue if platform providers refused to implement it.

**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 disagree, denying entry into the market to certain provider limits competition and stifles innovation, through increased licensing costs.

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

That entirely depends on the use of the ambiguous term, 'Intellectual Property Rights'. Is that Copyright, Trade Mark, Trade Secret, or Patent law? Or all or none of the above?

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

See previous answer, the wording of the original amendment is open to broad interpretation.

**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, DRM has a track record of only preventing legitimate customers from consuming media. It has not had an impact on copyright infringement. The key flaw in DRM design is that the content must be decrypted in order to view it.

**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? . :**

I disagree, DRM is costly to implement. Microsoft Vista is a casing example of this; encrypting all communication between participating identified modules requires more powerful hardware, and additional software development... And again, still defective as we are currently unable to encrypt between the display, and the viewer's retina.

**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? :**

Please be aware that certain Open Source licenses will require complete disclosure and prevent acts such as 'Tivo-isation'. Any form of DRM relies upon obscurity in the platform... Open Sourced DRM would lead to users replacing firmware in the DTT receivers, which will completely negate the effort.

**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? . :**

Yes, they do seem to be in-line with other 'horror' stories in the news regarding DRM and cable / satellite television implementations from other countries.

**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?:**

Please review the 'Royal Charter for the continuance of the British Broadcasting Corporation', and make note to specific references in regard to 'public interest'.