

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, I believe that Freeview should be working with partners which provide open content and that all this does is give more power to the currently dominant content producers that already provide content on Sky and through other locked down mechanisms. It sounds more like a mechanism to ensure provision of more of the same content that is already available through these other delivery channels, rather than broadening the market for content from other less restrictive providers.

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? :

All it does is restrict the rights of consumers in terms of time shifting or mobility with no genuine benefit. Freeview should not be implementing the same restrictions as the providers of pay walled content.

The obsession the industry has with how many hours of content people have stored on electronic devices should not be allowed to dominate the implementation of free to air television. There are only so many hours a day that can be used for interacting with entertainment, and that despite the fact that thousands of hours could be potentially recorded onto devices, how many of those hours are actually watched?

All these measures can do is frustrate and annoy consumers as they find restrictions put in place or find themselves having to junk perfectly good equipment because of an industry obsession. Consumers are better off with open content with an open delivery mechanism, not

a confusing mixture of both.

They stand in opposition to generations of open content delivery and this would be the first time that technology is used against the interest of consumers in free to air television.

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

No, restricting access to programme guides is highly inappropriate. Broadcasters should not be able to remove features from consumer devices in this way. EPGs should be provide in an open standard format and not locked down in any way. You should be able to pick up an EPG on any device, like a reminded programme on a PC or mobile device for instance where such restrictions make no sense. This is an example of killing potential innovation in the cradle, just at a time when TV viewing is becoming less compelling for a lot of people who are finding other things to do.

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

No. These kinds of restrictions should be kept off of Freeview.

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? :

If it stops people using open source software to record television for time-shifting purposes then I cannot see how that statement stands up to scrutiny. It goes against an open standards approach to broadcast television and pulls the rug out from under those who have dedicated a lot of time to producing this free software for consumers. It is providing market advantage to those who provide more expensive solutions and removing choice from consumers.

A guarantee that such content would be viewable under open platforms like Linux should be made at the very least. Not at some future unspecified time but at the time of release, and maintained throughout the life of the technology.

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, this is adding additional complexity and removes the option of obtaining less expensive equipment from elsewhere. I'm technically aware but have no idea which bits of my equipment will still work after this change.

I can't this as being anything other than a disaster for interoperability. In fact it is in direct opposition to interoperability.

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? :

Don't know

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? . :

Don't 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 future innovation around television delivery that could be curtailed by introducing such measures. Any technical measures like this are cutting off options for future development in return for perceived short term gains.