

**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. There is no reason why types of content that are available currently FTA would require additional copy management protection to survive the transition to HD technologies. It appears that industry (directly and indirectly through the BBC) is taking advantage of the planned HD rollout to request for additional copy management in Freeview HD.

**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. The encryption of EPG data to enforce manufactures to implement copy management is myopic. As the media stream itself is FTA, there is nothing to prevent a device from using EPG data from other sources, outside of the encrypted EPG SI stream for that multiplex.

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

No. See responses above.

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

No. See responses above.

**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. As digital encoding of data is inherently trivial to reproduce with computer equipment that is widely available, rights holders should concentrate on adjusting their business models to take advantage of the new landscape.

This is especially true as UK receivers of OTA broadcasts are already subject to a license fee. As we are in effect paying for reception of such content, it would be expected that we are granted the permission to use the content lawfully, as we please, unencumbered by the insistence of arbitrary rules by rights holders.

**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? . :**

**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? :**

**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?:**

Ofcom, as regulator, should be applying additional scrutiny to any shifting of rights from consumers to industry. Not only is broadcast content being sent on frequencies that are ultimately regulated for the benefit of the public, the public is also paying directly for the reception of such content. This is no different to previous industry objections after the introduction VHS for example.