

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.

Content management (DRM) stifles innovation, availability and freedom. DRM-encumbered media has a proven history of becoming inaccessible. If the media is inaccessible, how can the platform survive?

I welcome the flexibility and features of open-source software, and believe DRM will make such products more difficult to produce. Many commercial products are developed from open source initiatives, so DRM will make the content less widely 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.

I believe the "securing" of media via content management is unnecessary and actively damaging to consumers.

DRM/ Content Management schemes never work, c.f. DVD's CSS and Bluray's encryption -- both bypassed for the outlaws and now merely a hurdle to the average consumer.

The outlaws are unaffected, yet the paying consumer is harmed.

I will pay for media, if it's worth it. Content Management schemes devalue media.

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

No, not under any circumstances.

For one thing, I believe the restricting of EPG data will reduce the visibility -- and therefore the appeal -- of content; the exact opposite of the amendment's claimed purpose.

Restricting information in this fashion can have no benefit whatsoever for a paying, law-abiding, consumer: EPG data should be transparent and freely available.

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

No, for the same reasons given 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.

Applying DRM does not safeguard legitimate consumers; it merely makes everybody's lives harder. c.f the HDMI/hdcp handshake problems between some televisions and some devices - despite obeying the law, consumers are hurt by "protection" schemes.

I do not see "additional guarantees" as helpful or appropriate. I sincerely believe that the opening of content would help consumers and producers.

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.

DRM certification is usually expensive, and when compared to the cost of cheap DTT receivers (circa 30 GBP), it's an unjustifiable -- and unnecessary -- expense.

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? :

I am not a stakeholder.

I have no objection to compression of EPG data, but only if the compression scheme is freely available.

I see no requirement for restricting compression to DRM-capable receivers, and believe the clause is merely an attempt to add a shiny wrapper to DRM encumbrance.

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 cannot speak for other HD broadcasters

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?:

"Content Management/DRM" only ever hurts consumers.

DRM schemes add positive.

DRM schemes add cost, complexity, and problems. They reduce flexibility, accessibility and interoperability