

I am writing in response to the consultation "Content management on the HD Freeview platform". This response is in the form of an email as I am unable to locate the online consultation response form.

The BBC's proposals impose a restriction on the availability of some services to receivers that implement content management technology. My understanding from the details provided is that this applies only to the HD services on Multiplex B, however this is not completely clear.

The imposition of this restriction on existing broadcasts would imply a decrease in the service provision to existing receivers, which either may not be capable of being upgraded to implement content management or where the original manufacturers may be unwilling to produce any necessary upgrade.

The history of DRM is one of attempts by content providers to limit the use of their content and of countermeasures by freeminded technologists to devise means of overcoming these technologies. It seems unlikely that the BBC's proposals will be any exemption to this pattern, and hence I would expect that the proposals will ultimately be unsuccessful in preventing the "leaking" of content with its DRM removed, while inconveniencing the larger number of users who choose only to attempt to legally use the content.

The proposal to require in [HD?] receivers a number of technologies implies a restriction in the ability of the open source community to develop receiver software for use on platforms such as Linux, where these technologies are unlikely to be compatible with the GPL software licence normally used.

Furthermore, it also implies a restriction on the range of devices to which any recorded programme could be copied, as these would also require to support the selected DRM scheme. Different existing devices support different DRM schemes, making the chance of being able to copy a programme to any selected existing device unlikely.

Lastly, the implementation of a UK specific system does not appear to be in the interests of receiver manufacturers, who will be required to adopt their products specifically for this market, leading to increased costs to the consumer.