

**Title:**

Mr

**Forename:**

Neil

**Surname:**

Watson

**Representing:**

Organisation

**Organisation (if applicable):**

UK Film Council

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep nothing 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? :**

Yes. We also support the BBC's view that its proposals would help reassure rights holders that the copy management system on DTT is effective. The prevention of copyright theft and infringement is critical if the content industries are to flourish and thus some form of copyright management system is essential upon this platform. Film is likely to form an important part of an HD offer and it will be very important to rights holders that their intellectual property is protected. This will encourage them to make a wide range of material available on the platform therefore helping to secure its long-term viability.

**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? :**

Yes.

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

Yes. See response to Question 1.

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

Yes.

**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? :**

The UK Film Council supports the view of the British Film Institute - which we fund to deliver cultural and educational objectives - that a licence to software should be provided free of charge to the BFI and other trusted bodies by the BBC, to enable them to use the otherwise encrypted EPG data for the purposes which have been enacted through legislation and agreement. In particular, this will ensure that the BFI, as the designated National Television Archive, can continue to capture television programming for preservation and future access for research.

**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? . :**

Yes.

**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? :**

We are not in a position to comment on this.

**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? . :**

We are not in a position to comment on this.

**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?:**

No.