

Title:

Mr

Forename:

Vinothan

Surname:

Shankar

Representing:

Self

Organisation (if applicable):

Email:

neversaymonkey+ofcom@gmail.com

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? :

Not at all - content broadcast without "copy management" - meaning DRM - is much more flexible, and is easier to view for users of Free and Open Source software.

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 - content management systems make legitimate use more difficult, and generally do not prevent illegitimate use or even substantially inhibit it.

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

No. This would restrict users who use free software, such as MythTV, to watch content, as the content management systems cannot (in most cases) be implemented without the payment of a license fee to the patent holder. Naturally, this is not feasible for free software.

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

As I do not agree that multiplex B should be granted such an amendment, neither do I think multiplexes C or D should.

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? :

Not at all. Just as standard definition content is recordable and can be copied multiple times, those who would copy and make illegitimate use of HD content would defeat any copy protection scheme. This has been demonstrated with software and DRM-restricted media on the Internet - why would it be any different for broadcasts?

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, particularly as HD DTT receivers may be used as components in computer systems, and interoperability with Free And Open Source Software would be severely hampered.

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?:

Copy protection has been shown to be flawed in principle. Any form of copy protection in the digital age can be of limited effectiveness at best, and will harm legitimate users who do not wish to buy expensive software or new hardware.