

**Title:**

Mr

**Forename:**

Steven

**Surname:**

Holdway

**Representing:**

Self

**Organisation (if applicable):**

**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? :**

No. Restricting devices that can use the platform is more likely to cause a dip in its long term viability. By introducing this copy prevention system, you will be locking license-paying people from watching their programs (for example, people who ethically insist on free (as in freedom) software who can't use the proprietary boxes and formats).

**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. You are simply locking people from viewing content, you are not doing anything effective.

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

Entirely not. The amendments would, again, lock out users and force proprietary software onto the public. It would also produce a monopoly of vendors who sold receivers who would lock out other competition.

**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 as I have stated for the previous question.

**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? :**

By locking down content you will not be helping the end consumer, you would be protecting your own financial interests.

To safeguard consumers you need to allow normal, license-paying, people to be able to view the content in which ever way they want to. This way, you do not restrict the consumer and you still maintain profits from the media sales and license-fees.

**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? . :**

If anything, the cost will go down as major producers undercut the little businesses who will suffer as a result. Also, by introducing proprietary standards you completely remove it's use with a large number of HD consumer equipment (for example, MythTV).

**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? :**

As stated above, by introducing a standard only certain people can produce will cause a monopoly and lock smaller vendors out of the market completely.

**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? . :**

Only commercially sponsored digital HD solutions employ DRM as a form of control. Because of the nature of the BBC, it would be inappropriate to use solutions to secure corporate foothold to control content.

**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?:**

As said above, adding DRM solutions to the airwaves would cause vendor lock in, loss of consumer interest, essential theft of funds from people who own a television but ethically refuse to use proprietary software and, ultimately, because of the shedding of consumers there would be a drop in funds for the BBC.