

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. DVDs can be relatively easily copied now - BlueRay as well - yet content still comes. The problem is not the casual user, but the die-hard pirates who will steal content en masse and profit from it. Since they have a fiscal interest, they *will* break the locks - so all you have is an inconvenience for joe public while doing nothing to protect organised theft of content.

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 don't see that it's necessary... just because you're increasing the number of pixels changes nothing IMHO around the likelihood of copying/distribution. As the bar shifts, HD content temporarily becomes more valuable - but, once it's the majority, it's "just content".

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

No.

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

They should be kept in line, so the inference is "no" - unless an amendment is made to actively prohibit such DRM, in which case it should flow through.

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. It's just not worth it. Just because you theoretically can doesn't mean that you should. I personally do not see what "guarantees" are needed when the average user simply does not download stolen content, or would happily use an on-demand service instead of downloading if such a system were broadly available. Consider the example of US imported shows, since they're part of the "... but rights holders won't let us...". I would contend that most downloads here are because people have missed it or want to watch it *now* rather than outright, deliberate download-for-keeps-for-free. Compare this to domestically-produced content, such as iPlayer- or 4OD-sourced material - how much of that is downloaded instead of streamed?

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. All DRM causes problems. Every software player would need to be updated, and thus include (pay for?) a licence - otherwise home theatre PCs or hardware streamers would all fail. It's bad enough with a move from MPEG-2 to MPEG-4 in terms of the amount of obsolescence this causes; once DRM is in the mix, you'll simply start to throw away hundreds of pounds worth of kit too often, because an algorithm is improved/strengthened, for example.

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? :

No - see Q6. Big companies may be able to develop cheaply, and recover costs over vast numbers of devices; small, niche players and software players (e.g. MythTV, Kaffeine) would be disadvantaged. Again.

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? . :

No opinion. Probably not - people like control, even if it's illusory.

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?:

See earlier comments regarding the DRM "arms race", previous successes/failures and how they've effectively done nothing for wholesale piracy yet limited people's rights/abilities to reasonably watch and enjoy content in a multi-device, multi-format, portable, on-demand world. It's a legacy idea that you watch or record, and if you record then you watch later

while sitting in front of the TV. I may want to watch some on the move, some in the lounge, some in the kitchen, some on my PC... to do that, I need access to the content without having to upgrade everything or worry about subtleties of implementation of the algorithms.