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?:

Possibly, but it would would only be commercial material that the IP owners want to proffit from. This type of material should be available on commercial channels not the BBC.

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. It is too broad and too open to future misuse.

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?.:

No

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. Citizens should automatically be assumed to be breaching IP rights. Neither should they need to ensure that their equipment supports the appropriate DRM standards.

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? .:

That is a rather narrow question, if only it was that simple. It would be better to examine the total cost of supporting the whole system, from the cost to licence payers to the cost of replacing exisiting equipment. The cost of most consumer electronics is set by what the consumer will bear, not by cost of components and their manufacture.

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?:

I'm not sure what the the affect of this on the market for HD DTT receivers has on this. It is a socio/political/philosophical decission, nothing to do with sales and marketing.

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 idea

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?:

Yes. As a license payer I have already paid for the material the BBC provides. I resent being treated as a criminal. If it the BBC is getting into deals with third parties that require DRM, then is should exit gracefully and get back to providing its own programs entierly from the licence fee. If tallent or co-sponsors do not like it then they can go elswhere. The BBC should use the strength of its brand to attract the sort of content that wants a wide audience, not a quick profit. DRM is not the answer to the BBC's problems - it is a slippery slope to commercialisation.