

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.

They are *capable* of making all HD content available now, they simply choose not to as it will either cost too much to purchase the rights necessary or down to stubbornness of the part of content providers.

They are under the mistaken impression that DRM is infallible and a magic-bullet to prevent material appearing on the internet.

If implemented, it is simply a matter of time until the encryption method is broken by third parties, and all of this will have been for nothing.

Anything that can be viewed, can be copied, and no amount of encryption will prevent this.

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 an 'ugly hack' to bolt unnecessary functionality onto freeview that it was not designed to handle.

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, It will exclude every device purchased that is not capable of being patched in order to cope with the content management system.

One solution would be for the BBC to replace upon request every such device for a compliant one of equal or greater capabilities

Such a scheme should be run entirely at the BBC's own cost and not passed onto the consumer.

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, Since the content management technology is likely to be implemented in software, hardware costs should be kept to a minimum - however any costs with licensing of encryption technologies and any upgrades required to make HD DTT receivers capable of decryption in realtime will be unavoidably applied. As far as interoperability is concerned, any incompatible device will have to be replaced - and this is a significant cost.

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? :

Yes, every manufacturer will simply have to license and implement the appropriate encryption scheme. So long as licenses are available on a non-discriminatory basis at equal cost then this should have no effect on the market.

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? . :

That would be a question for the other HD Broadcasters

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?:

The BBC are not required to show content from providers who choose to make it difficult for their material to be viewed, they can show other material or commission more of their own instead if they choose.