

**Title:**

Mr

**Forename:**

Nigel

**Surname:**

Pritchard

**Representing:**

Organisation

**Organisation (if applicable):**

STMicroelectronics

**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? :**

In an era when we have the expectation to take legally acquired copies of media content wherever and whenever we change location (within home or alternative premises) it would be

severely detrimental to any new content delivery service to restrict the ability to make at least a minimum single hard-copy of that content.

DTT is viewed as a "free" system in every sense of the word and it is this aspect that gives it its ubiquity. Any attempt to constrict content accessibility will only serve to ensure the likelihood of its failure to succeed.

HD is the natural progression for DTT and given its competitive situation versus certain pay-channels any attempt to significantly restrict access will have a negative effect on its viability to even begin let alone survive into the future.

**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? :**

Yes

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

Yes

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

The concepts are equally valid and desirable for all services available on the platform.

**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 objections anticipated.

**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 practical impact on receiver costs and implementation perceived.

**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 practical impact perceived for correctly licenced receiving equipment.

**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 conflicts anticipated.

**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?:**

None that we are aware.