

thank you for the excellent summary compiled by Ofcom for the current consultation.

the DEA was designed to be a spectacular waste of everyone's time for the hoped benefit of a few anachronistic corporate lobbyists, and wasting everyone's time and resources in these consultations and risible attempts to regulate what is technically designed to route around censorship is indeed the only sure effect it will have had until some less lacklustre PMs will sit in Parliament. i feel genuinely sorry for the amount of hopeless work these servants of the people (but actually lackeys of corporate interests) have inflicted on Ofcom.

the day that the European Commission will halt the proposed Code because of the barriers it imposes on ISPs' business i will come to your offices and offer drinks and cake to everyone involved in this endless paperwork as a sincere thank you for the energies that you had to spend on this caprice of corrupt PMs rather than investing these energies in something more beneficial to Ofcom and to society at large.

anyways, getting to the points of the consultation:

i would like to recommend that clarification is given as to the role of wifi providers so that they are explicitly excluded from the provisions of the Code. otherwise, let's all start lobbying to make Transport for London and the local boroughs accountable for the use of the public roads that is made by miscreants going about to break the law.

as for costs involved with CIRs, i believe that paragraph 36 of the Code is superlatively inadequate to address the huge financial and organizational burden bestowed on ISPs, which cannot be expected to compete for technical excellence, as should be their business aim, when they are expected to build too uncertain capacity to address the whims of corporate barons.

i am considering offering business coaching to excellent network engineers wishing to start their own ISP, as the market for small ISPs will surely boom once the Code with the threshold of 400K customers is in effect. hoorray for small ISPs! we might all have to put up with some glitches in technical support until they build capacity, but who cares, when we can get access to an uncensored and unsnooped Internet!

on paragraph 38, i'm sure this must be a huge, embarrassing typo: subscribers should clearly *receive* a payment with each report in order to allow them to dedicate resources to an appeals that most likely will be bestowed upon them with zero reliability nor any possibility of peer-review of the methods used to determine alleged infringements at the time the determination was undertaken. it would seem a bit bizarre that a customer of a business, both surely presumed to be innocent until otherwise proven in court, should be paying anything at all for the "privilege" of being able to defend themselves. this is surely dystopic, bordering on demented.

finally, regarding paragraphs 8, 9, 16 and any other parts of the Code related to gathering of "evidence" (i put this in quotation marks because every Internet engineer worth their while will well know that the "evidence" that the media industry's lobbyists are wildly dreaming is technically impossible in this context): i understand that Ofcom had to come up with some fancy terms to

address the legislator's delirium that convinced too many MPs that any kind of infringement tracking can have any reliability, but let's perhaps take courage and tell 'em MPs that they should better catch up with reality and stop believing that The Series of Tubes that they might think the Internet is, in fact works a little bit differently from what they have been told by the media industry's lobbyists and what they have seen in Minority Report and other science fiction movies?

detection of alleged infringements without full disclosure of the source code of all the components used for detection, without peer review of this code and any relevant methods used in "detection", and without the possibility for independent third parties to triage the results of these "detections" *at the same time* through different software, independently audited, is tantamount to random finger pointing, even forgetting about open wifi (which might as well open itself by way of routers being reset to their default settings after a power failure), the fact that IP addresses cannot identify anything else than an IP address and certainly not a person, etc. etc.

by the way, speaking of "detection": can you imagine the life of someone whose job consists in using clunky software to "detect" which IP addresses are allegedly at the front of a NATted network on which someone has forgotten a copy of "Juicy P***y 7" on a wifi-enabled flying drone? i cannot even start thinking about it without feeling deep shivers of compassion for these people's misery running down my spine.

anyways, i could go on for days pointing out all the dystopian delusion that Ofcom had to distill into this Code to give MPs some illusion that their censorship dreams are anything else than dreams, but my time is limited, and i'm sure other sensible people are flooding you with sensible recommendations to limit the societal harm of the mess that the DEA, shameless regurgitation of a parliament in washup, is going to inflict on innocent citizens who surely have better things to do than being snooped on by unaccountable private organizations sanctioned by a disgraced parliament.

best regards