

Title:

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Representing:

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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? :

No.

Freeview and analog TV is broadcast without these restrictions. The content providers agreed with these arrangements when Freeview was established. They will not wish a reduction on their potential broadcast market in the UK so are unlikely to restrict sales of material to HD DTT providers if the restrictions are blocked.

This is a bluff which, in the interests of the public, should be called.

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.

This system will stifle innovation in the sphere of HD DTT because of the licensing restrictions surrounding decoding of content. UK industry in general will be poorly served by the central, provider control that is inherent in such an approach.

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

No I do not.

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

No I do not.

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.

The material should be made available on the same basis as all other DTT and analog broadcast material.

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.

Open source software for DTT reception, which is essentially free or very low cost, will be made impossible to produce because of the licensing and compliance costs and requirements for the copy management system.

It will be next to impossible to produce such a system for an open source operating system such as Linux, which has many advantages over closed source environments. Users of other minority operating systems will also be poorly served.

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.

I for one watch most of the television I watch using Freeview broadcast DTT recorded on a Mac. This is because the programmes I wish to watch don't usually mesh with my own time schedule, so I use this equipment to time shift. If I cannot record or see when an HD DTT programme is being broadcast, then I will not record or watch it. An HD DTT receiver will be of no use to me, so I will not purchase one.

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? . :

I am not a broadcaster so cannot comment.

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?:

Development of innovative software for HD DTT viewing etc. is poorly served by the BBC's proposals and does not appear to have so far been addressed. A wide choice of systems for the consumer, of options for the developer and a level playing field so that anybody can innovate will be best for all concerned.

The BBC's proposals will ensure that large companies who can pay large fees and other costs for encryption systems. This will guarantee that there will be little innovation in the HD sector.

I myself will not be watching HD DTT as this move progresses, and will stick with normal LD DTT. I'm sure this will be true of many others. If you want HD DTT to fail, go ahead with this proposal.