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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. The assertion that the BBC will lack HD programs has not been backed up by any figures at all. Furthermore the BBC is in the position to commission such work as required and on its own terms.

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, I do not agree with you premiss that content management is required at all for this. Since the dawn of analogue TV the BBC has broadcast freely to the UK and there is no compelling reason for it to change this policy.

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

No. The benefits of compressing data (4.53) can be achieved without closing the format.

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

No. The proposal will simply impede legitimate users of the system, and will not stop those intent of abusing copyright.

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. Again, you are phrasing this question based on the presumption that it is necessary or effective for HD, in a manner that it is not for standard definition.

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, and there is no evidence to back up its effectiveness in the BBC's request. It prevents free use of the system and it prevents an open source implementation as you cannot publish the content management system. You seem to confuse the ability of a manufacturer to make use of open source software with an open source system. This proposal would mean no open source systems.

Finally, in the BBC's submission, the statement "Collectively, manufacturers indicated that they would much prefer a fully standardised content management system, thus ensuring a 'level playing field' for competing products." (p81) sounds very much like an existing cartel wishing to have no lower cost competition for the UK market. That alone suggests that free and open is going to deliver a better choice of equipment for the consumer.

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, as for my answer to Q6. Furthermore, the BBC is not in the same position as the Sky & Virgin as they do not operate a 'pay to view' service.

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, as there is no figures to back up the broad assertion that content management is needed for the BBC to deliver HD. Once more, your questionnaire is working on the presumption that the BBC should operate like Sky/Virgin/etc bidding for HD content from suppliers who have an ideological aversion to open broadcast.

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?:

Eventually all content will be HD, and this proposal is effectively mandating content management as the future norm. The BBC is almost unique in commissioning high quality work based on our license fee, and we should be free to view it without being tied in to restrictive license arrangements.

History has shown that Digital Rights Management is not effective at stopping 'piracy' and only serves to irritate legitimate consumers and to restrict their freedom. The music industry has given up the fight for imposing DRM and is learning to work with consumers by offering them what they want, hence the BBC's proposal is a short sighted move to appease some suppliers and I do not believe it will help consumers in any way.