

**Cover sheet for response to an Ofcom consultation**

**BASIC DETAILS**

Consultation title: Content Management on the HD Freeview Platform

To (Ofcom contact): David Harrison

Name of respondent:

Representing (self or organisation/s): Creative Coalition Campaign

Address (if not received by email):

**CONFIDENTIALITY**

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

**DECLARATION**

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name Signed (if hard copy)

David Harrison  
Strategy and Market Developments  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

2 April 2010

Dear David,

Subject: Ofcom consultation: Content Management on HD Freeview

The Creative Coalition Campaign (CCC)<sup>1</sup>, representing the UK's creative sector, welcomes the opportunity to submit these brief comments in response to Ofcom's consultation on content management on HD Freeview. Our comments represent a broad-based expression of support for the BBC's request for an amendment to its licence for Multiplex B ("the Multiplex B Licence") in order to carry forward content management plans for HDTV services carried on the DTT platform.

As we understand it, the Ofcom consultation considers a proposal from BBC Free to View Ltd (the "BBC") that would require the inclusion of content management technology in receivers for High Definition Television (HDTV) services on the Freeview Digital Terrestrial Television (DTT) platform, enabling the management of the copying of content from high definition receivers to other consumer devices and its distribution to others over the internet.

Digital technology is enabling a wide range of new business models. The increasing availability of faster broadband connection speeds and the falling cost of digital storage mean increased opportunities for content providers but also make it easier to distribute unauthorised copies of HD content over the internet and on physical media such as Blue-ray DVD. We understand that the BBC's and other broadcasters' wish to construct a balanced, effective DTT content management system.

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<sup>1</sup> The Creative Coalition Campaign was formed in August 2009 to encourage the Government to combat the threat that online copyright infringement, including illegal file-sharing, presents to future content creation not to mention many jobs, including sound engineers, camera crews, set designers, IT workers, make-up artists, journalists, printworkers, script writers, proofreaders, retail shop assistants and freelance photographers, among others. According to the Department for Culture, Media and Sport, the creative industries now account for economic output of at least £60 billion per annum. This translates to more than eight per cent of UK GDP and puts the sector ahead of both construction and tourism in terms of its contribution to the UK economy. Various surveys have suggested that the number of UK citizens involved in infringing copyright in relation to films, TV and music is between five million and 10 million. This represents a significant threat to UK jobs. Organisations supporting the Creative Coalition Campaign include the following: BECTU, BPI, BVA, CEA, Directors UK, ERA, Equity, Federation of Entertainment Unions, FDA, MPA, Musicians Union, National Union of Journalists, PACT, PPL, FACT, TUC, Unite the Union, The Writers Guild, DACS, and UK Screen. See <http://www.creativecoalitioncampaign.org.uk/home/>

The goal of course is to ensure that the widest possible range of attractive HD services are made available to consumers on DTT free-to-air (FTA) to foster competition with other digital TV platforms. This increased competition will benefit consumers by creating more choice as well as access to early window content.

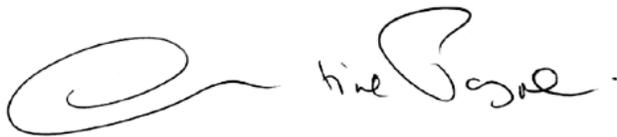
The CCC would like to acknowledge the BBC's efforts to construct a content management system for HD FTA that addresses the concerns of all stakeholders. Content management technologies offer a flexible means for content providers to create new opportunities for consumers to enjoy a broader variety of content.

As such, the BBC's proposed measures are vitally important to the widespread availability of content to the Freeview HD platform. The CCC supports the BBC's proposal and believes that the inclusion of a copy management system will likely attract a broader and richer range of HD content on DTT. Moreover, the CCC would like to voice support for further enhancements to the BBC's proposal and indeed believes that technology will permit further refinements over time. Individual members of the CCC will be putting forward more detailed submissions and making proposals for additional content management functionalities designed to attract a broader range of HD content on DTT.

Experience has shown that protected platforms will attract more content. The CCC and its members welcome further discussion with BBC, Ofcom and other stakeholders.

With all good wishes

Yours sincerely

A handwritten signature in black ink, appearing to read "Christine Payne". The signature is fluid and cursive, with a large initial 'C' and a distinct 'P'.

**CHRISTINE PAYNE**

Chair of the Creative Coalition Campaign