

**Title:**

Mr

**Forename:**

Len

**Surname:**

Goddard

**Representing:**

Self

**Organisation (if applicable):**

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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 BBC has stated that it expects to apply DRM to only a small part of its output. In my opinion the inconvenience and irritation induced by DRM schemes far outweighs the benefit of being able to display a small amount of extra (mainly bought-in) content.

**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? :**

Since I do not accept the need for CRM or DRM this question has no relevance.

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

No

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

No.

**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? :**

I do not accept the necessity of DRM/CRM.

**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. I have no feel for the cost but I am absolutely sure that it will interfere with any but the most trivial of home cinema setups.

**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? :**

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**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? . :**

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**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?:**

Technology is such that any DRM is likely to be broken very soon after introduction. As such this measure would be of temporary utility and lasting inconvenience - like DRM and region coding on DVDs, which can be trivially bypassed by those wishing to rip/duplicate content but which make perfectly reasonable uses (like putting purchased content onto a central home server) far more laborious than it need be.