What do you want Ofcom to keep confidential?:

Keep name 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.

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? :

Unlikely; it is important to look at the breadth and depth of Digital Rights Management systems in use today.

It is trivial to find situations and use cases where the systems in use (reasonably or unduly) restrict the use of content by the consumer.

I suggest it is a wholly more challenging task to find one that has, in fact, restricted the abuse of content by tose so minded.

In fact I'd go further; you will not find such a system.

As such it is difficult to envisage a situation wherein an observer who honestly had the consumer's interests in mind (at all) could conclude that a DRM system will in fact inconvenience anyone other than the legitimate consumers of the content.

They are, literally, hoops through which only law abiding consumers must jump - to those who do not abide by laws, they are an irrelevance within weeks of implementation.

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? :

See question 2 above. The assertion is laughable.

Technical solutions are unworkable simply because of scale: more able minds will be bent to breaking the content restrictions than are bent to implementing them.

And as software piracy has consistently shown; it is likely that the some of the same engineers that designed the system will contribute to sidestepping it.

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? . :

This entirely depends on the specifics of the mechanism used.

Nevertheless; imposing this requirement on receivers etc cannot do anything but reduce choice of equipment in the marketplace.

Manufacturers of such equipment would be the people to contact regarding this question, not the general public.

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? :

I am not a stakeholder, nor do I work for a manufacturer of relevant equipment, and cannot therefore answer this question.

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? . :

Ask the other broadcasters.

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?:

Unsure.

The key issue is that, in the medium to long term, the proposed technical system will not achieve what the BBC claim it will. What it will do is appease their business partners, and pass on the cost of that appeasement to equipment manufacturers and hence to consumers.

It is also worth noting that since the ubiquity of downloadable illegitimate content became a fact of life, repeated attempts to close the barn door after the horse has bolted have, in every case, simply pushed more and more people to the illegitimate content sources.

That is to say; each attempt to lock down legitimately aquired content has made it increasingly awkward to consume that legitimate content.

Meanwhile the initial effort required to aquire content through illegitimate means looks increasingly simple by comparison.

In other words: the better digital rights management works, the more prevalent piracy will become.