

**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. It is not management, it is restriction. History shows that all restricted systems wither and die compared to open systems using open standards. Content creators thrive when a larger audience can see their product legitimately, leading to follow on sales. If content is constrained by DRM it leads to piracy and the loss of that revenue stream.

**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. It could be applied to all content at any stage in the future.

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

No. The industry group has obvious vested interest in controlling the deployment of content.

**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? :**

No. Any content can always be copied by "pirates" and DRM only inconveniences the ordinary consumer.

**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. It would mean that all receivers had to have a DRM system compatible with all possible portable players, which would not be easy to achieve. What happens in a family where each person has a different portable player and wants to copy the content?

**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. It would mean that all receivers had to have a DRM system compatible with all possible portable players, which would not be easy to achieve.

**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? . :**

Probably

**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?:**

The current generation of "digital natives" prefer to consume media on a range of devices and rarely watch broadcast TV. The BBC's proposal seems rooted in an outdated viewing pattern and more of a concern for industries protecting their revenue streams than providing a 21st century media distribution solution for the public.