

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? :

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? :

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

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

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, I disagree here - as usual with proposed content management systems the only people who will suffer are the legitimate users who pay the license fee. This will not dissuade serial pirates. Other HD content management systems, as well as a plethora of SD content management systems, have so far failed to make any significant dents in the availability of content from illegal sources.

Furthermore this will stifle innovation in a number of potential areas of innovation (e.g. device-device transfers of recordings, such as set-top box to portable viewer or other STBs

within a household). This in turn reinforces the illegal distributions channels further, by virtue of the fact that they are the only source of unencumbered content.

In short technical solutions do little to reduce piracy, whilst penalising customers and stagnating the markets for receivers.

The only appropriate guarantee here would be that license fee payers remain free to use the content they (are forced to) pay for.

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?

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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? :

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? . :

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?: