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.

HD will happen regardless. Consumers have access to Blu-Ray and other HD content, and even HD camcorders. The expectation will be that TV too should be HD.

I can't think of a single DRM scheme that has ever actually worked. It always gets cracked and bypassed and ends up just being an annoyance for legitimate uses.

These schemes just add inconvenience to legitimate users and they're completely ineffective in preventing illicit use.

As usual, this is a case of content creators trying to close the barn door after the horse has bolted. Chances are, the material being discussed will have already been copied from other sources (eg. Blu-Ray, Cinema) by the time it gets onto Freeview HD.

Content creators really need to figure out that creating and distributing content has a certain level of risk and loss involved and they can't eliminate it completely. It's the cost of doing business.

What are they going to do? Say "Well, there's no DRM on DVB-T2, so we're going to throw away all possible global revenue from digital terrestrial."? Unlikely. The studios were against home video, but now they make a fortune from it. The same will happen here.

Unlike every other broadcaster in the world, the BBC really does have the clout to say "Like it or lump it".

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.

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

No.

In the words of Sir Humphrey Appleby: "If you must do this damn silly thing, don't do it in this damn silly way."

It's clearly a hack to try to bodge a little security into the system, but it's a red herring: it just won't work.

Locking down the EPG is probably the least effective way of dealing with the problem, as the EPG data will be easily obtained from other sources.

So basically, this measure is toothless: if someone's determined to break copyright law and distribute material on the Internet, they're not going to be stopped by this weak roadblock.

The BBC has made great strides in making programming metadata publicly available, such as that available through Backstage. This opens up a lot of interesting possibilities for innovation, even by hobbyists and enthusiasts.

By locking this down, the public is limited to the functionality that the hardware manufacturers are willing to provide... which historically has been the very least they can get away with providing.

For example, I use a computer in my attic to record television, which I then playback on my laptop over WiFi. I can stream Live TV to my laptop wherever I am in the house and move from room-to-room in the middle of a programme. I am not aware of any commercial hardware system that can do this, and yet it's astonishingly useful.

The recordings are determined by scanning the EPG data for programmes that I've watched in the past. I can schedule new recordings from my iPhone while out and about.

At no point are the recordings seen by anyone outside my house! It's a 100% legal setup but the DRM measures proposed would prevent anything like this from working.

Instead, we'd have to deal with the crashy, difficult-to-use interfaces that are available on commercial DVRs. These are fiddly to use and give no capability for development.

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. As stated above. Limiting access of the SI data alone destroys the ability to do some very useful LEGITIMATE things with the data (such as smart recording as mentioned above, streaming to multiple devices within the same home)

To make such systems work, users will have to resort to unofficial sources of the SI data, making their legitimate activities illegal based on a technicality.

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? . :

It'll have a large negative impact on the interoperability with other HD consumer equipment. As I said above, a number of interesting capabilities would be prevented by these measures.

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.

There are a number of vendors who publish DVB software used around the world who are unlikely to have the resources to develop specific DRM-capable software just for the UK market.

In addition, open source systems would not be practical, notwithstanding the minor admission in section 3.7: this would make a fully open-source solution impossible and deflate any enthusiasm the community has in using it.

The only ones who will bother are the few large manufacturers who have already proved themselves incapable of releasing compatible hardware in time for the Freeview HD launch.

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?: