

**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? :**

No

**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? :**

No, DRM schemes are fundamentally flawed. They are only temporary protection until the scheme is defeated. If something is to be broadcast free in the UK, it makes little sense to restrict the consumption of the material after broadcast.

**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, the long term effect will mean consumers have to buy new set top boxes more often.

As the DRM schemes are defeated they will have to be replaced, manufacturers will not support updates to older models and consumers will have no alternative but to replace them.

**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? :**

Recreating the required lookup tables by analysing the original Huffman encoded data stream and using known strings of data output by a legitimate Freeview HD receiver is a trivial undertaking; particularly if these lookup tables are static.

**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? . :**

N/A

**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?:**

I really don't mind if this scheme is accepted, because it is ineffective. DRM is generally flawed, but this appears to be particularly easy to bypass. Obfuscation of data is an inadequate means of security.