

**What do you want Ofcom to keep confidential?:**

Keep name confidential

**If you want part of your response kept confidential, which parts?:**

Email address

**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:**

Asking for responses in MS word format is a bit silly. There are many flavours of MS word format that are misunderstood in different ways by different versions of MS word. Pick something portable like PDF, ODT or HTML.

**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. DB+ is almost broken now

DTT will not be the only medium without DRM, and others will follow. If DRM is implemented for DTT it will just add cost and hassle for users until it gets broken. DRM has an exceptionally poor reputation among consumers. If the keys are changed when BD+ is completely broken then that reputation will get even worse.

Consumers like to try before they buy. If they like something then they will buy if the price is reasonable because they are not a bunch of thieves. The sooner rights holders understand this, the sooner DRM can be forgotten.

**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. The FreeviewHD trademark will be associated with DRM so people will actively avoid it. If the EPG's are encrypted, they will be available on the internet for free.

**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? :**

I do not agree. They would have to provide non-patent encumbered free open source codecs for all existing equipment and all future equipment. I would much rather they spent license fees making programs they can broadcast than spend money on software that prevents me from watching restricted broadcasts.

**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? . :**

I do not agree. Software quality comes from peer review and the right to tinker. Patent royalties will bump up the price of equipment, and lack of openness will cripple interoperability.

**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 think the market will segment into licensed and unlicensed receivers. That will reduce economies of scale and increase the price. At the same time, it reduces the value of receivers: you can either have interoperability or EPG.

**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? . :**

I am not an HD broadcaster.

**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 music industry has near enough worked out that DRM is a waste of time and money. The film industry will catch on eventually.