

**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:**

Yes

**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? :**

I agree that the implementation of DRM could POTENTIALLY broaden the range of HD material, but I am not agreeing that the proposed DRM is, in the final analysis, beneficial.

**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's been proved that DRM doesn't work - just look at the increase in sales of legitimate DRM-free MP3 files over protected ones. Even Steve Jobs has stated he would like to drop DRM - all it does is infuriate legitimate users who can't use protected files on certain devices and it doesn't pose much of a problem to the freeloaders as DRM systems are constantly being broken.

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

No, I believe that Freeview should remain an open FTA platform. It could set a precedent that may lead to more parts of Freeview being 'closed off' and it may eventually lead to Freeview becoming yet another PTV platform, leave PTV to Sky and Virgin. Ideally, the whole of the DVB-T bandwidth should be given over to Freeview as most people consider Top-Up TV to be a complete waste of space.

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

No, as I've stated above I think all of Freeview should remain open - that's its strength that it's totally free of limitations, as soon as one Mux is granted the ability to 'close off' part of its service to some form of DRM system then this may be rolled out to the other Muxes.

**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 it wouldn't safeguard citizens and consumers legitimate use of HD content, as I've said it would annoy legitimate users and wouldn't prove a barrier to the dedicated P2P user - the BBC could find itself spending valuable licence-fee money locked in a cat-and-mouse battle strengthening the DRM, like Sky have over the years whenever their encryption is broken.

**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? . :**

Of course this will affect the price of DVB-T2 PVRs, certainly initially. And other connected devices will have to be made compatible, which will also cost money.

**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 wouldn't have a negligible effect on the market for DVB-T2 receivers as compressing the SI using Huffman coding would mean increased costs in licencing the technology.

**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? . :**

As I've said before I don't agree with any form of DRM implementation on the Freeview platform. If a DRM-free Freeview means less imported HD material then so be it - leave it to the PTV platforms. At a time when the BBC are cutting services they should not go down the route of spending money on costly protection systems - the last time the BBC had their own conditional access service was BBC Select which was a disaster. The BBC should spend licence-fee money on what it's good at - producing quality TV and radio.

**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?:**

Ofcom should take into account why licence-fee payers who don't want any of the limitations and cost of a PTV service choose Freeview. Going down the route proposed by the BBC could mean significant licence money devoted to pointless DRM technology and expensive HD imports. This may eventually lead to all programming (HD, SD and audio) on all

networks becoming protected. The licence-fee payer would, in my view, not benefit from this proposal.