

**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. This would not broaden the available content. The BBC has a rich tradition of being one of the finest creators in the world of content including drama, film and educational programming which is renowned around the world. This technology will destroy the edge of the innovation that the BBC leads in the way that content can be repackaged (within the rights holders copyright). This re-production for educational purposes is used heavily in primary education, secondary education and FE and HE - with this technology in place this simply will not be possible without financial boundaries

**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? :**

ANY broadcast that already conforms to the DVB standard are already able to 'protect' content from copying - why should the BBC go against the DVB standard thus rendering years of investment made by individuals and business and schools in technology to 'show' content would be unjust. We have already had to go and buy a new TV, Freeview or Satellite receiver to view TV in this country - if this is allowed then we will all have to replace equipment again just to watch the BBC. Who is going to pay for that - the public again!

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

NO. The amendment would do nothing more than slip in through the backdoor later technology that would reduce further the rights of the public to record for lawful purposes

material that is transmitted FreeToAit by the nations broadcaster which after all we as license fee payers are already paying for. The fact that SKY gets programming first is because they are prepared to pay for it, and as a Sky subscriber, they do invest in programming and I also have to pay for it. If the BBC were allowed to do this, all that would happen is Sky will constantly outbid the BBC for programming in HD and thus my Sky sub would rise, the License fee would rise to pay more and I would need to purchase additional equipment that 'conforms' to a yet unknown standard.

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

No views.

**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. Many of the restrictions would be towards the 'multiple use' which means that no digital transmission could be done. Currently, many people can re-use content from iPlayer and transmit without any complicated hardware or software although - this is not permitted by the BBC or rights holders. If the BBC can still publish material on iPlayer then I don't see why they think that this will help - the only winners in this whole saga are the greedy programme makers who just want to 'sell' it and are not really interested in who is seeing, just that it is being paid 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? . :**

Perhaps if enough manufacturers are involved then the cost of the receiving equipment will not be too different. The interoperability with other equipment will simply be non-existent unless you re-purchase new recording equipment even if you own HD recording today, it will not be compatible.

**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? :**

This will increase costs and reduce compatibility. If the standard is D-book and the BBC is going to use Huffman code (which can be decrypted with some effort - ie. once the tables are known then these will be available on the internet for anyone to use and thus creates a waste of time, effort and money from both the BBC and the consumers and let's not forget the greedy film makers) would this be fully compatible with Dbook ??? I am not sure that it would, thus creating the need for receivers to be dual mode ie Dbook and BBC-Huffman.

**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? . :**

No views.

**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 BBC is public funded - like many other organisations in the UK. How far would we get if the NHS said that they would only care for sick or injured people if they had purchased a particular wrist watch and that they must be wearing it when they are admitted - but to read the time the watch maker had to know crypto tables and so did the patient and be able to decrypt the time to tell the nurse. Not sure this would work out well and this is what the BBC is proposing.

BBC has a duty to provide free programming (albeit with the license fee) to ALL!! all of this proposal is not compatible with this commitment and requirement.