

**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. I believe that if the BBC and others refused to implement the copy protection then the rights holders would have no choice but to continue providing their content.

It is not a question of copy protection broadening the range of programming; it's a question of large media companies threatening to shrink 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? :**

It is not appropriate in the slightest. It is a back door to DRM. It is actually less appropriate in my eyes than directly encoding the signal, because at least then they would be honest about what they are trying to achieve.

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

No. Choosing who can see the EPG data seems completely unfair to me. You need a licence to watch the TV, but you don't need a licence to see what is going to be on TV. Perfectly well-meaning TV watchers, predominantly those with lesser-known devices or Media PCs, will not be able to see a programme guide. That seems like a completely backward move in the 21st Century, particularly when these kinds of devices are shaping the future of how we watch TV.

**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. The only way they could safeguard legitimate use is to not restrict the devices which can view the content, which is fundamentally incompatible with the BBC's proposal.

**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? . :**

Not qualified to answer.

**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 don't imagine the market will suffer, because most people won't even realise what's going on; they will continue to buy their big brand receivers as usual. The people who will suffer are the lesser-known PVR and TV card manufacturers. This will not make a large dent on the overall market, but that is not to say these companies won't be missed.

**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? . :**

Not qualified to answer.

**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?:**

Rather than focusing on whether this proposal offers a good means of protecting content and whether the market will suffer, I think Ofcom should be more concerned with the fact that it only serves to strengthen the largest and richest companies, leaving others in the cold.

Also, who said content protection on TV was something we should be aiming towards? People have been able to record TV shows for years, for the most part so they can watch them at a more convenient time. Why should we leave it to the content owners to decide what we can and can't record?

Furthermore, the proposal limits the choice of the consumer, and means that anyone who has had the nerve to build their own media PC and run open source TV software on it will be forced to pay more for a "compliant" solution that will be inherently less customisable and more restrictive. Why should such a consumer renew their TV licence when it is now restricting the manner in which they can watch the programmes they have paid for?

So in conclusion, there is something to gain for large companies, and something to lose for small companies and the consumer in general.

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