

**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.

Inclusion of copy management/restriction is against the spirit of the BBC's charter, if not the letter:

it encourages restricted rather than free access to content.

The music industry is slowly removing copy protection from it's digital products, mainly through public pressure:  
witness the increasing numbers of online music outlets now offering unmanaged MP3 format music downloads.

Why should the video industry be any different?

This being the case, this technology will soon be obsolete:

I fail to see how building obsolescence into DTT will "help secure its long term viability as a platform".

All this will do is encourage trogodyte behaviour by content providers.

Copy protection only protects against naive consumers:

any copy protection system can be subverted with sufficiently sophisticated hardware, thus creating a new black market in "pirate" hardware.

Finally, electronics and computer enthusiasts will no longer be able to freely build their own receivers:

a long tradition in this country.

**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? :**

If the answer to question 1 is "No", then this question is irrelevant.

Even given a positive answer to Q1,  
the answer to this question is "No":  
the proposed Huffmann tables will, like any widely copied so-called secret, "leak",  
thus rendering EPG compression useless as a security method.

**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? :**

Irrelevant.

**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? .. :**

Irrelevant.

**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? :**

Irrelevant.

**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? . :**

**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?:**