

**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

**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

**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? :**

DRM can never be an open technology. If it were an open technology then by its open nature, it could be trivially bypassed. This means that as a closed technology, the BBC will be promoting (and therefore forcing) the technology of a particular manufacturer or group of manufacturers on its viewers.

As such the additional requirement that the chosen DRM implementation should be open source.

**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?**

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No, as the DRM solutions proposed can never be an open technology, there will always be some form of license fee or group membership fee for manufacturers to pay to gain access to the technology. This cost will have to be passed on to consumers for NO added benefit.

**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 this is a bogus argument. The equivalent would be adding 3 new lanes to every motorway in the country. To drive in these new lanes your car would have to have a special sticker in the window, and the only way of getting this special sticker was to buy a sat nav from a nominated manufacturer. Only instead of working as a consumer would expect it to, this special sat nav would only allow you to make any journey once, apart from on Sundays.

**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, until you're forced to pay per pixel you view, each time you view it, they won't be happy.

**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 commission a report into the effectiveness of existing DRM implementations, such as those applied to DVDs, in both their direct benefit to consumers and their effect on piracy. Only then once an independent study has verified any benefit to the consumer or license holder, should this be allowed.