

**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 refused to employ content management, most content providers would make their content available anyway rather than losing the BBC as a distribution platform.

**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. Restricting receivers and other devices to only those compatible with the BBC's chosen content management system would exclude those with older equipment and would no doubt introduce lots of compatibility issues with newer equipment and those wishing to view on other kinds of platform such as phones, home computers, game consoles, etc.

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

No (see answer to Q2).

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

No (see answer to Q1).

**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? :**

I believe that if BBC HD includes a content management mechanism, it would be very tempting to use this for more and more content, eventually all of it. The only viable guarantee is to say that 'free-to-air' means 'free-to-air', that content management will never be employed, and that licence-payers will have unrestricted access to the content for which they have already paid.

**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? . :**

Yes, but see answer to Q2. There are bound to be compatibility issues and unexpected restrictions, some platforms may never be supported, and the licence-payer will suffer.

**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. EPG data must be freely available to licence-payers.

**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? . :**

Irrelevant. This consultation is not about 'other broadcasters'. The BBC is not like 'other broadcasters' because of its unique method of funding, so no comparison need be made.

**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 best interests of the licence-paying public.