

**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? :**

A limited, and guarded yes.

Clearly a system such as Sky has, works well, but that is not being proposed here.. all that is being hidden here is the EPG.

**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.

Any PC can trivially receive the data, record it, and upload it to the internet (given the video/audio is proposed to be unencrypted). (DVB cards are available for around 30 pounds).

A loss of a broadcast EPG is hardly an issue to a modern pc with internet access. There are multiple online EPG providers (Digiguide, xmltv) that already have integration into existing recording / pvr software. Even Microsoft Media Center obtains its own EPG data, only using broadcast data when it's own is unavailable.

**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? :**

Yes, in that the proposed approach is ineffective, and proposes no challenge at all to people wishing to pirate the content.

So anyone unable to use the content due to the restrictions will likely find the content available online with minimal effort.

**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? . :**

**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? :**

**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?:**

In the entire document, not one mention of Windows Media Center. A Software PVR shipped with virtually every copy of Vista, and Windows 7.

No mention is made as to if they have considered if their alteration would prevent viewers watching via Windows Media Center from viewing/recording their HD content. Something which is possible, if they comply with standards.

If the BBC wishes to properly encrypt, then it always has the option to issue a standard CI CAM to all it's viewers, with a smart card, remaining within the DVB standards, and enabling use of existing PVR/Receiver technology. Yes, this is expensive, but it would properly protect the data, in a proven manner. (Just ask Sky).