

**Title:**

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**What do you want Ofcom to keep confidential?:**

Keep nothing 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? :**

I disagree strongly. There is no evidence that any DRM secures long term viability of any respective platform. Only DRM-free platforms can be viable long term. As a user I avoid

using DRM-enabled platforms and if it is not possible to avoid using them I will look for and apply DRM-circumvention measures.

I disagree that DRM are necessary for prevention of piracy and I believe that DRM is an instrument enabling and supporting anti-competitive behaviour.

In addition DRM is meant as a technological agent automatically interpreting laws in favour of the rights holders and bypassing the proper legislative and judicial process and as such DRM is infringing consumer rights.

DRM is also conducive to spread of corruption among lawmakers and government officials and it is easy to see why.

**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? :**

I disagree. BBC should offer the rights-holders to either provide the content DRM-free or to refuse to provide it at all, thus limiting their distribution channels. BBC has enough clout to negotiate such arrangements.

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

I disagree with the principle of "content management" as I believe it is a flagrant infringement of my rights and contrary to public interest.

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

I disagree for the same reason as above.

**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 disagree. There is no difference between SD and HD content from the point of view of its informational value for consumers. Consequently, there is no justification for any additional restrictions/guarantees for HD content.

**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? . :**

I don't have enough information to judge that.

However, it is well known that royalties for the use of "intellectual property" related to DRM constitute a major part of the high-street price of consumer devices, such as BD players. There is no reason to expect that this will be different for receivers.

**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 know what other stakeholders think. I will not use receivers which apply "content management" or DRMs (at least until I find a reliable DRM-circumvention method) so will affect the market by reducing demand. I have no way of knowing how many other "stakeholders" will follow that route.

**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? . :**

I don't know.

**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?:**

I have no opinion.