

Title:

Mr

Forename:

David

Surname:

Shields

Representing:

Self

Organisation (if applicable):

Email:

david@regionalservers.com

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? :

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? :

No. No guarantees would be effectively appropriate. DRM is going to be bypassed / broken anyway by those who wish to distribute the material, leaving DRM inconveniencing only those users who had no intention of breaking the copyright in the first place.

DRM is never effective, and never appropriate.

How would limiting copying of content to 1 copy (for example dumping a film from DVR to disk to free up space) "safeguard citizens and consumers" ?

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? . :

No, I absolutely disagree. And 'state licensed / sanctioned' equipment is an appalling concept, with interoperability being laughable if this is implemented.

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? :

Not sure.

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? . :

Not relevant given my negative answers to DRM being implemented by BBC. I really could not care less whether the other broadcasters requirements for DRM.

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?:

DRM is, generally and specifically, awful. It restricts user choice (interoperability becomes a sham when the interoperable devices are a drastically limited subset of 'approved' devices chosen by the board). It is vulnerable to removal of service at the whim of the DRM provider (a number of DRM content providers have already proved an example of this when they arbitrarily decide the service does not fit their current business model, and cut the service, leaving users with unviewable / unlistenable content).