

Title:

Mr

Forename:

Eric

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Baker

Representing:

Self

Organisation (if applicable):

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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? :

No - the content providers threatened boycotts of HD in the USA but caved in as soon as DRM was denied them by the courts. All the content the BBC is talking about applying DRM to is already broadcast DRM free in the USA.

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. There should not be any dictating by the BBC re which devices us licence fee payers can use to view the content we fund. Their proposal would make it impossible to view content on all the players, devices to help the partially sighted and so on that are around now and in the future.

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

No - it is quite improper for Ofcom to aid the BBC in restricting consumers' choice of viewing devices. This is all about physical devices, not about broadcasting.

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? :

Absolutely not. It would stop us doing all sorts of legitimate things (like playing content on our new phone on an aircraft to while away the time). In practice many legitimate viewing devices would not support BBC style DRM, especially as similar DRM proposals were defeated in the USA. How can you expect a phone or media player maker in Korea to do something special to their devices to suit a peculiarity of one small market?

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 way. In practice they would prevent a lot of legitimate use and encourage piracy. All DRM can be cracked easily by experts and the BBC proposals would simply make a large body of people used to getting content from dubious sources - that could well spill over to behaviour in other areas, eg music.

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

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? . :

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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?:

Yes. Ofcom's consultation seems to be based on the idea that content providers would boycott DRM free HD broadcasts in the UK. The USA experience shows that's unlikely. It also seems to assume that whatever DRM the BBC used to restrict broadcast material would be incorporated into all the devices that might be used legitimately to view that content. That's a preposterous idea given the tiny size of the UK market in global terms.