

Title:

Mr

Forename:

Michael

Surname:

Biggins

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Email address.

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:

This questionnaire would be indecipherable to anybody except those with knowledge of DRM, media and broadcasting technologies.

Since this is meant to be a public consultation, it should be presented such that a member of the public with no particular technical expertise would be able to understand the issue and comment upon it.

Otherwise, this questionnaire is as good as useless.

Also questions below that reference particular parts of the new agreement should quote the relevant text for convenient reading, as finding the appropriate text in the full document is time consuming and difficult at best.

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. It would alienate customers who wish to legitimately use the content, thus ensuring that they stop (or less frequently) consume HD content.

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? :

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

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

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. The current safeguards make no allowance for long-term archiving/storage, or appear to allow for the transferring of recordings from device-to-device except on an ad-hoc basis.

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. They are proposing the use of new encoding standards not supported by current hardware. Since Full-HD adoption rates have been comparatively slow (Both the TV itself and devices attached to it supporting HD) then those buying *now* will lose out. The bad-will created by being told they have to upgrade - purely for the BBCs benefit and for the purpose of restricting how they consume media - will result in a fall in adoption rates, driving up costs and prices as demand falls.

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?:

Because the public at large will not understand the issues involved until actual changes are made - Ofcom will not be able to foresee any consequences of actions taken.

As outlined in my additional comments, the issue of DRM in broadcast media is complicated at best, and comprehension of such is limited to those with technical expertise.

Try again, but ask in such a way that a normal member of the viewing public can understand - making sure they understand the consequences of any particular change. You will almost certainly find a different response to those who are likely already familiar with the proposed changes.

The bottom line however, is that the proposed changes *restricts* the consumers ability to consume media that they are paying for (Either because the BBC produce it themselves, or use our licence money to sublicense programmes.) and then making the consumer pay out for new equipment to support this - is quite simply unacceptable on all levels.