

**Title:**

Ms

**Forename:**

Rachael

**Surname:**

Bond

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

[ofcom@rlb.me](mailto:ofcom@rlb.me)

**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. With DRM it might be impossible to record programmes for private use using pc/media system software without applying "hacked" patches that would, in themselves, be theoretically illegal. This would criminalize the activities of license payers who only wish to record the content for legitimate purposes.

Further, if the BBC believes that any form of DRM cannot be quickly broken then they are sadly mistaken. A quick search on Google will reveal software that removes all forms of current DRMs including Blu-Ray Discs, DVDs, and both DRM systems by Apple & Microsoft

**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? . :**

Yes

**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? :**

Yes

**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? . :**

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?:**

Implementing any form of DRM is, at best, playing King Canute against the abilities of programmers. It is an ineffectual technology that cannot work, yet which may make "criminals" out of ordinary viewers.